TULE WIND PROJECT
GENERAL PLAN AMENDMENT REPORT

November 2011

Prepared for:

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CHAPTER 1 - INTRODUCTION

PURPOSE AND APPLICABILITY

Tule Wind LLC (the applicant) is proposing to amend the County of San Diego General Plan to allow construction and operation of the portion of the Tule Wind Project (proposed project) on private lands within the jurisdiction of the County of San Diego. In accordance with Board Policy I-63 and the General Plan Amendment and Zoning Guidelines, the Director of Planning and Land Use authorized the Plan Amendment Authorization (PAA) 3801-11-001 on July 15, 2011.

Tule Wind LLC is proposing eleven specific amendments to the recently adopted *San Diego County General Plan: A Plan for Growth, Conservation, and Sustainability* (adopted August 3, 2011), in particular, the Boulevard Subregional Group Area Plan or "Boulevard Plan") as set forth below. For the purposes of this General Plan Amendment Report (GPAR), an analysis of the Tule Wind Project's consistency with the applicable goals, policies, and objectives of the General Plans is included herein. A discussion of the project's general plan conformance with the pertinent goals, objectives, and policies of all of the Elements of the General Plan is provided in Chapter 4.

AUTHORIZATION

The authorization of PAA 3801-11-001 allows the processing of a GPA to modify the policies of the General Plan Regional Land Use Element and Mountain Empire Subregional Community Plan as requested (original PAA request). As part of a supplemental PAA request, the applicant identified four more policies of the Boulevard Plan that may need to be amended prior to the Board's approval of the proposed project. A copy of the authorization letter is provided as Appendix A.

During preparation of this GPAR, the applicant identified two additional goals (Goal LU 1.1 and Goal LU 6.1 of the Boulevard Plan) and four additional policies (Policies LU 1.1.2, 6.1.1, 6.1.2, and 6.1.3 of the Boulevard Plan) that need to be amended, as well as an additional Section that needs to be added to the Boulevard Plan prior to the Board's approval of the proposed project.

This GPAR is the applicant's formal request for authorization to propose amendments to Goal LU 1.1, Goal LU 6.1; Policy LU 1.1.2; Policy 6.1.1; Policy 6.1.2; Policy 6.1.3 of the Boulevard Plan; and to add a new Section 7. Tule Wind Project to the Boulevard Community Plan (11 amendments total, see Table 1).

POLICY FRAMEWORK

The San Diego County General Plan, the Mountain Empire Subregional Plan, and the Boulevard Subregional Group Area Plan, provide an overall policy framework for the Tule Wind Project. Chapter 4 of this GPAR provides detailed analysis regarding consistency of the project with the goals and policies contained in these documents.

ORDINANCES AND POLICIES

The following ordinances and policies are applicable to the Tule Wind Project.

1. County of San Diego Zoning Ordinance
    a. Section 1300: Civic Use Type – Major Impact Services and Utilities (§1350)
    b. Section 1800: Extractive Use Type - Groundwater Extraction Operation (§1810)
    c. Section 2720-2725: A-72, General Agriculture Zone Use Regulations
    d. Section 2920-2926: S-92, General Rural Zone Use Regulations
    e. Section 6951: Development of Large Wind Turbine Systems
    f. Section 7350: Use Permit Procedure

2. San Diego County Code of Regulatory Ordinances
    a. Sections 51.201-51.209, Light Pollution Code
    b. Sections 67.701–67.703, 67.710–67.711, 67.720–67.722, and 67.750: Groundwater Ordinance
    c. Sections 67.801–67.825: Watershed Protection, Stormwater Management, and Discharge Control Ordinance
    d. Sections 68.508–68.518: Construction and Demolition Debris Ordinance;
    e. Sections 86.501-86.509, Biological Mitigation Ordinance
    f. Sections 86.601-86.608, Resource Protection Ordinance
    g. Sections 87.201-87.804 Grading, Clearing, and Watercourses Ordinance

PROJECT DESCRIPTION

The Tule Wind Project (in its entirety) will consist of wind turbines, an overhead and underground electrical collection system and transmission line, a project collector substation, an operation and maintenance (O&M) building, transportation haul routes and access roads, a temporary concrete batch plant, a parking area, laydown (staging) areas, and meteorological towers.

A description of project components and activities for the portions of the project within the County of San Diego jurisdiction is provided as follows.

On-Site Project Components and Activities

The on-site project components and activities (including alternates) would include the following:

- Up to 7 large-scale wind turbines (in the 1.5 to 3-MW range) and associated generator step-up transformers;
- Portions of the 34.5-kilovolt (kV) underground collector cable system linking the turbines together;
- Improvements to existing private roads and the construction of new access roads;
- Up to three construction wells (One well to remain throughout operation);
- One temporary laydown area;
- One temporary Batch Plant;
- One O&M Building;
- One Septic System (O&M Building);
- One Project Collector Substation; and
- Extraction of approximately 16 to 18.9 million gallons (49 to 58 acre-feet) of water over the course of the construction, and an estimated 2,500 gallons per day (2 acre-feet per year) for ongoing operations.

Off-Site Project Components and Activities

Off-site project components and activities are necessary to construct and operate the proposed project. Off-site project components and activities include the following:

- Construction of a 138 kV transmission line and associated transmission towers proposed to run south from the project collector substation to interconnect with the SDG&E proposed Rebuilt Boulevard Substation; and
- Improvements to existing County maintained roads including Ribbonwood Road and McCain Valley Road to accommodate equipment delivery.

Project components and affected properties are illustrated in Figures 1 and 2 of this GPAR. A full description of the proposed project components and activities is included as Appendix B (See also Major Use Permit 3300-09-019), and the affected properties are presented in Appendix C of this GPAR.

DEVELOPMENT APPROVALS REQUIRED

The following approvals are required to construct and operate the Tule Wind Project:

1. General Plan Amendment – As the subject of this GPAR, an amendment to the County's General Plan is required to modify policies of the Boulevard Plan that restrict renewable energy on the project site.
2. Major Use Permit – An MUP is required to construct and operate of the Tule Wind Project as proposed, and for the extraction of approximately 16 to 18.9 million gallons of water over the course of the construction from on-site wells. Tule Wind LLC's MUP application is currently under County review.
3. Zoning Ordinance Amendment - Portions of the Tule Wind Project within County Jurisdiction (Turbines R-1, R-2, and R-7 thru R-11) do not comply with the Large Wind Turbine Regulations in Zoning Ordinance Section 6951 because the project does not meet the setback (§6951.a.) and height (§6951.e) requirements. Tule Wind LLC applied for an amendment to the County of San Diego Zoning Ordinance for wind energy on June 1, 2011 to modify the requirements to allow the project as it is proposed.
4. Building Permit – Building permits are required to construct the Tule Wind Project.
5. Grading Permit – The Tule Wind Project is required to be in compliance with the County's Grading Ordinance, and obtain a Grading Permit from the Department of Public Works (DPW).
6. On-Site Wastewater Treatment System Permit – The proposed O&M building will require a septic system to be reviewed and approved by the Department of Environmental Health (DEH).
7. Water Well Permit – A water well permit is required from the DEH for groundwater extraction during construction and operation.
8. Encroachment Permit - The 138 kV transmission line within the McCain Valley Road ROW is shown in the Plot and Grading Plans, and Tule Wind LLC will proceed with acquisition of an encroachment permit in accordance with County of San Diego DPW requirements if this option becomes feasible.

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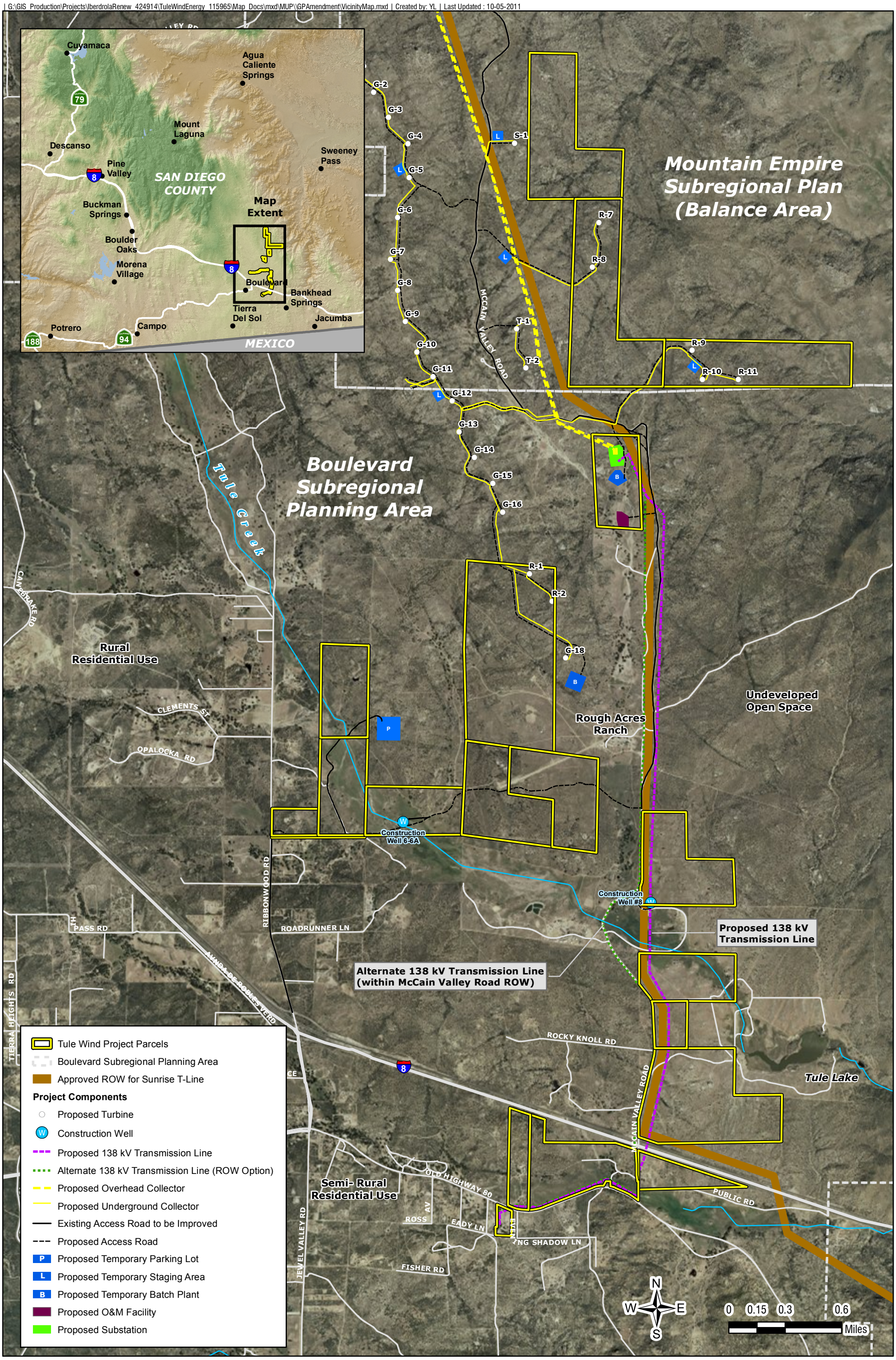

Tule Wind Project Vicinity Map

FIGURE 1

Tule Wind LLC | Tule Wind Project | General Plan Amendment Report

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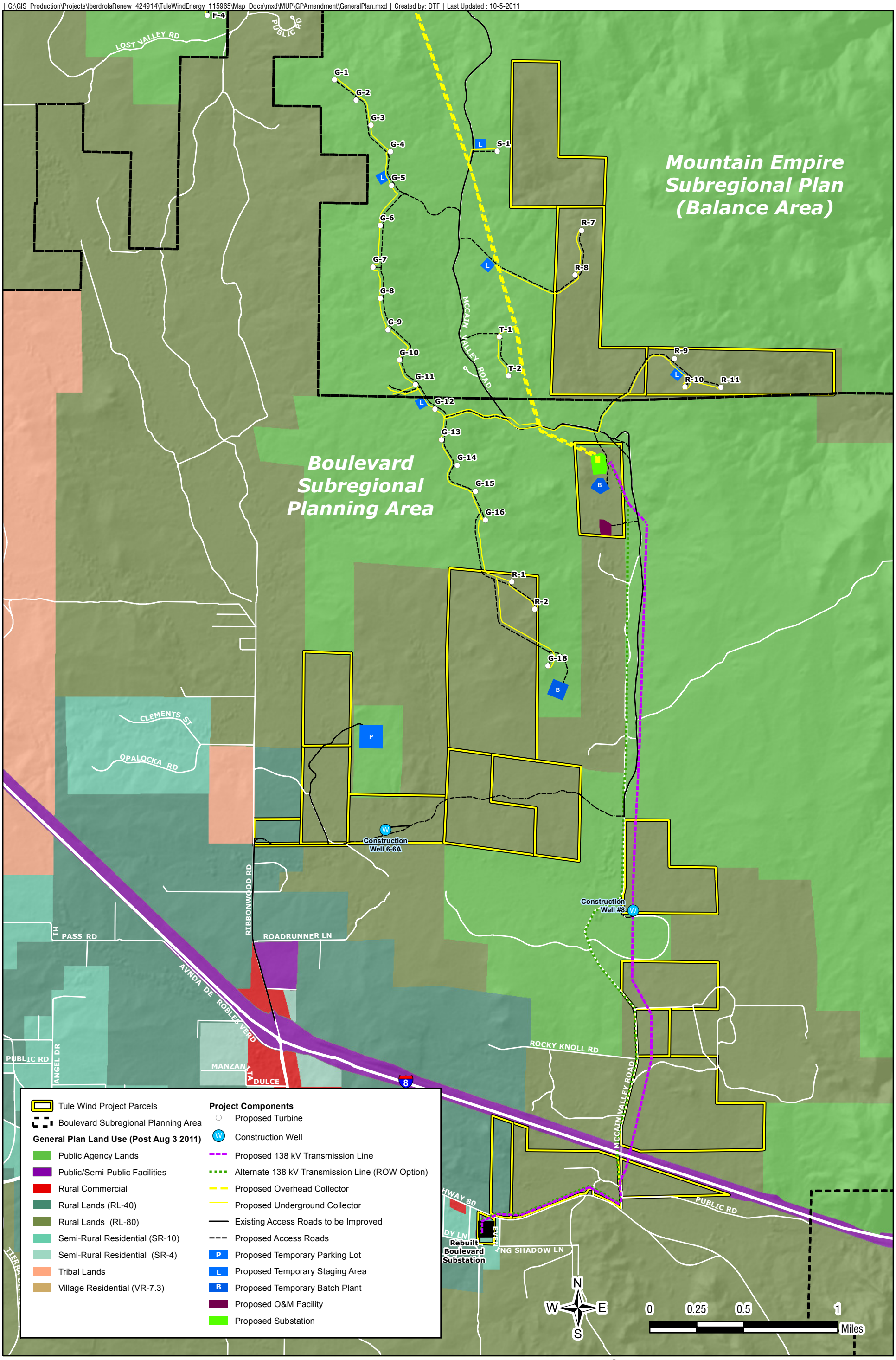

General Plan Land Use Designations

FIGURE 2

Tule Wind LLC | Tule Wind Project | General Plan Amendment Report

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CHAPTER 2 – PROJECT SETTING

LOCATION

The Tule Wind Project is located in the eastern portion of San Diego County, approximately 50 miles east of the City of San Diego, 90 miles west of Arizona, and is north of the community of Boulevard. The area is accessible via Interstate 8 (I-8), State Route 94 (SR-94) and Ribbonwood Road junction, and McCain Valley Road off of Old Highway 80.

The majority of the Tule Wind Project is located on federal lands managed by the Bureau of Land Management (BLM). Portions of the project are also on lands owned by the Ewiiaapaayp Reservation, Campo and Manzanita Reservations (access only), the California State Lands Commission (CSLC), and privately-owned parcels under the jurisdiction of the County of San Diego.

PHYSICAL FEATURES

The majority of the project area lies in the McCain Valley, in the In-Ko-Pah Mountains adjacent to the Tecate Divide, south of the Cleveland National Forest. The topography of the area is gently-to-moderately sloping with an elevation ranging between about 3,600 and 5,600 feet above mean sea level (AMSL).

The landscape surrounding the project area is predominantly open space with steep slopes, ridges and heavy rock outcroppings within state parks, tribal, and BLM lands. The Cuyamaca Rancho State Park is to the west, the Anza-Borrego Desert State Park is to the east, BLM lands are to the north, and south of I-8, the landscape is predominantly rural with desert vegetation and terrain primarily within County of San Diego (County) jurisdictional lands.

AREA HISTORY

The project area is located north of the rural village area of Boulevard; and known as Rough Acres Ranch. Rough Acres Ranch was historically farmed and used for grazing. An unregistered private airstrip still remains on the property. The site used to be the home of the Chargers training camp.

Over the past decade, various energy and transmission projects have been approved and constructed in the surrounding areas of the project site.

EXISTING LAND USES

The existing land uses in the area are characterized by large lot single-family residences, large and small ranches historically used for cattle grazing, livestock production and horses, and a very low-density population. Small-scale agriculture operations are scattered throughout the surrounding area, typically dry land farming or grazing. Topography, however, is the primary limiting factor for agriculture, with the surrounding area's steep, rocky terrain.

The Rough Acres Ranch project site contains scattered development with cottage type structures, barns, and other ancillary development reflective of typical ranch development. The majority of the project area is undeveloped in nature. The Rough Acres Ranch is currently and has historically been used for grazing.

PLANNING HISTORY

Major Use Permit

The initial application for MUP 09-019 was submitted to the County on October 9, 2009. In response to the initial MUP application, the MUP application was deemed incomplete, pending submittal of required information and/or

documents requested in the Environmental Scoping Letter (dated October 28, 2009) and MUP Scoping Letter (dated November 6, 2009). Tule Wind LLC resubmitted the application for MUP 09-019 to the County on December 10, 2010. In the County's letter dated April 14, 2011 (MUP Application Resubmittal One & Post DEIR/EIS Review Comments), the County deemed the MUP application incomplete, pending submittal of supplemental information and/or documents outlined in the letter and Project Issue Checklist. The April 14, 2011 letter also included Department of Public Works (DPW) Preliminary Draft Requirements for the proposed project[1].

On October 21, 2011, supplemental technical reports and project information for the MUP 09-019 application was submitted to the County to fulfill the information and data requests identified in the County's letter dated April 14, 2011 and Project Issue Checklist.

General Plan Amendment

A PAA was filed on June 1, 2011 to amend: 1) General Plan Policy 2.4 Multiple Rural Use (18) category; and 2) Mountain Empire Subregional Plan Industrial Policy/Recommendation 11 of the General Plan that was in effect Pre-August 3, 2011. On July 1, 2011, subsequent amendments to the October 2010 Draft version of the Mountain Empire Subregional Plan for the Boulevard Subregional Planning Area (Boulevard Plan) Policies LU 1.1.1, 1.2.2[2], 6.1.4, and CM 8.5.1 were proposed as part of the PAA. The Threshold Decision that authorizes PAA 3801-11-001 to amend the policies noted above for the Tule Wind Project was received on July 15, 2011.

On August 3, 2011, the Board of Supervisors adopted the *County of San Diego General Plan – A Plan for Growth, Conservation, and Sustainability*.

During preparation of this GPAR, the applicant identified two additional goals adopted in the General Plan (Goal LU 1.1 and Goal LU 6.1 of the Boulevard Plan) and four additional policies (Policies LU 1.1.2, 6.1.1, 6.1.2, and 6.1.3 of the Boulevard Plan) that need to be amended prior to the Board's approval of the proposed project. As part of this GPAR, the applicant is also proposing a new section to the Boulevard Plan (Section 7. Tule Wind Project). The proposed language for the amendments is included in Chapter 3 of this GPAR.

Meetings have been held with County DPLU staff on the format of the proposed amendments, relative to the existing policy structure of the Boulevard Plan; and the interpretation of the applicable goals, policies, and objectives of the General Plan, relative to the Tule Wind Project. This GPAR addresses the eleven specific amendments to the Boulevard Plan in the format the County has requested for the goals and polices to be amended. An analysis of the project's consistency with applicable goals, policies, and objectives is provided in Chapter 4 of this GPAR.

Amendment to the County Zoning Ordinance

As part of the PAA application, Tule Wind LLC requested amendments to the Zoning Ordinance for wind energy. Currently, the Tule Wind Project is inconsistent with the setback and height requirements set forth in County Zoning Ordinance § 6951. These standards were put into place long before the development of the modern wind energy industry, and are proposed to be amended as part of this GPAR.

Based on the applicant's substantial wind energy operations throughout the United States and corresponding experience, Tule Wind LLC has determined that the appropriate setbacks for wind turbines should be 101% of the blade length from adjacent property lines of property owners who are participating in the project, and 131% of the

[1] Subsequent to the issuance of the April 14, 2011 letter, Tule Wind LLC received a Revised Project Issue Checklist and Revised DPW Preliminary Draft Requirements on June 13, 2011. The Project Issue Checklist and DPW Requirements later eliminated the public road requirement; and revised associated Comments 48, 63, 75, 76, 86, and 87 relative to the public road requirement accordingly.
[2] Policy 1.2.2 of the October 2010 Boulevard Plan was corrected to read as Policy 1.3.2. of the General Plan (adopted August 3, 2011).

turbine tip height from adjacent property lines of property owners who are not participating in the project or who have not otherwise provided consent when measured from center of turbine to property line. Furthermore, Tule Wind LLC has found that in certain situations, waivers from these setbacks may be appropriate and should be considered.

For the portions of the Tule Wind Project within the County's land use jurisdiction, the project can be designed to meet an even larger setback of four (4) times the turbine tip height from any existing residence, even though this is larger than the setback that Tule Wind LLC has found necessary. As mentioned previously, the project can also meet the standard of 131% of the turbine tip height for adjacent property lines of property owners who are not participating in the project or who have not otherwise provided consent.

Specific features of the Tule Wind Project and the project site make it appropriate for the County to adopt specific setback and height standards that differ from County Zoning Ordinance § 6951, currently in effect. Although a comprehensive update to the County's Wind Ordinance is already underway, the DPLU's process for updating the County's Wind Ordinance is not expected to be completed prior to the point when the Board of Supervisors will be asked to consider the Tule Wind Project.

CHAPTER 3 – GENERAL PLAN AMENDMENT REPORT

PURPOSE OF THE GENERAL PLAN AMENDMENT REPORT

The underlying land use designations for the project area are not proposed to be amended as part of this GPA. Rather, the proposed GPA is limited to one new section of the Boulevard Plan that consolidates the proposed amendments to the goals and policies of the Boulevard Plan listed below in Table 1, General Plan Amendment Items.

As shown in Table 1, this GPAR addresses the applicant's proposed amendments to:

1. Boulevard Plan Goals LU 1.1 and 6.1;
2. Boulevard Plan Policies LU 1.1.1, 1.1.2, 1.3.2, 6.1.1, 6.1.2, 6.1.3, 6.1.4, and CM 8.5.1
3. Boulevard Plan Section 7, Special Wind Project

Table 1. General Plan Amendment Items

Item	GPA Policy in Conflict	Tule Wind Project Facilities
Boulevard Subregional Group Area Plan (Adopted August 3, 2011)		
#1	Goal LU 1.1 (Boulevard Plan)	Two (2) turbines (R1 and R2)[1]; Portion of the overall collector system; Access roads; One temporary laydown area; One temporary batch plant; One O&M building; One project collector substation; Portion of the 138 kV transmission line;
#2	Policy LU 1.1.1 (Boulevard Plan)	
#3	Policy LU 1.1.2 (Boulevard Plan)	
#4	Policy LU 1.3.2 (Boulevard Plan)	
#5	Goal LU 6.1 (Boulevard Plan)	
#6	Policy LU 6.1.1 (Boulevard Plan)	
#7	Policy LU 6.1.2 (Boulevard Plan)	
#8	Policy LU 6.1.3 (Boulevard Plan)	
#9	Policy LU 6.1.4 (Boulevard Plan)	
#10	Policy CM 8.5.1 (Boulevard Plan)	
#11	Section 7, Special Wind Project (Boulevard Plan)	

Source: County of San Diego General Plan

[1] Turbines R1 and R2 are subject to the policies of the Boulevard Subregional Plan because they are currently within the boundary of the Boulevard Subregional Planning Area. However, if at a later date, turbines R7 through R11 become subject to the policies of the Boulevard Subregional Plan or if the boundary of the Boulevard Subregional Planning Area is expanded to include turbines R7 through R11, the applicant requests all seven turbines proposed in the jurisdiction of the County (R1, R2, and R7 through R11) be included under as part of this proposed General Plan Amendment.

PROPOSED AMENDMENTS

Purpose for Amending the General Plan

The purpose for amending the General Plan is to 1) harmonize the goals and policies of the Boulevard Plan with the Guiding Principles, Goals, and Policies of the Conservation and Open Space Element of the General Plan which encourages the production of renewable energy; 2) ensure that the Boulevard Plan (which contains specific language that appears to prohibit wind projects particularly), does not contradict the Guiding Principles of the Conservation and Open Space Element; and 3) allow for construction and operation of the Tule Wind Project

General Plan Amendment Items

The following section provides the changes to the plan text (underline text) by providing a new section within the Boulevard Plan that will specifically exclude the Tule Wind Project from the two goals and eight policies in the Boulevard Plan that are in conflict with the implementation of the project.

> Section 7. Tule Wind Project
>
> The Tule Wind Project (Major Use Permit 3300-09-019) includes the development and operation of a wind turbine system that is located partially within the Mountain Empire Subregional Planning Area and the Boulevard Community Planning Area. The part of the project located in these planning areas includes the following components: Seven large wind turbines, collector lines, access roads, one temporary lay down area, one temporary batch plant, one operations and maintenance building, one on-site collector substation, and approximately four miles of a 138 kV generation transmission tie line.
>
> The Tule Wind Project was analyzed in the Final Environmental Impact Report/Environmental Impact Statement (FEIR/FEIS), SCH No. 2009121079, DOI Control No. DES 10-62, certified by the California Public Utilities Commission on [DATE TO BE DETERMINED UPON CERTIFICATION], approved by the United States Bureau of Land Management on [DATE TO BE DETERMINED UPON APPROVAL], and includes mitigation measures and other design features that reduce most of the project's the impacts to the environment.
>
> The purpose of General Plan Goal COS-18 and Policies COS-18.1 and 18.3 is to facilitate the development of alternative energy sources, such as renewable wind energy, that minimize their impacts to the community and environment. The Tule Wind Project is consistent with this General Plan goal and these policies because the project would provide approximately 200 mega watts of clean renewable wind energy and incorporates a number of design and mitigation measures to reduce its impacts to the environment and the community. Furthermore, there are limited areas in the County that have sufficient wind resources for large wind energy projects. The proposed Tule Wind Project would be located in one of those areas. Because the Tule Wind Project is consistent with the General Plan goal and policies listed above, the project is exempt from, and is not subject to, the following goals and policies in the Mountain Empire Boulevard Subregional Group Area Plan (Boulevard Plan): Goal LU 1.1, Goal LU 6.1 and Policies LU 1.1.1, 1.1.2, 1.3.2, 6.1.1, 6.1.2, 6.1.3, 6.1.4, and CM 8.5.1. These goals and policies are intended to provide broad protections to the Boulevard community and environment. In providing this exemption, the County Board of Supervisors has determined that the Tule Wind Project has appropriately addressed its potential adverse impacts to the community and environment.

EXISTING SUBREGIONAL PLAN

The portion of the Tule Wind Project within the jurisdiction of the County is within the Mountain Empire Subregional Plan "Balance Area" and the Boulevard Subregional Group Area Plan. On August 3, 2011, the Boulevard Plan was adopted plan as part of the County's comprehensive General Plan Update, and therefore the associated goals and policies of the Boulevard Plan are applicable to a portion of the Tule Wind Project.

PROPOSED SUBREGIONAL PLAN

With the exception of the proposed amendments to the Boulevard Plan (Items #1-11 above), no changes to the boundaries or land use designations of the Mountain Empire Subregional Plan or Boulevard Plan are proposed as part of this GPA.

EXISTING REGIONAL CATEGORIES

The Regional Category for the proposed project is: Rural Lands

PROPOSED REGIONAL CATEGORIES

The applicant is not proposing amendments to the Rural Lands Regional Category as part of this GPA.

EXISTING/PROPOSED LAND USE DESIGNATIONS

The General Plan land use designations for the proposed project are: Rural Lands (RL-80), Rural Lands (RL-40), and Semi-Rural Residential (SR-10). The underlying land use designations for the Tule Wind project area are not proposed to be amended under this GPA. Rather, the proposed amendments are limited to the items listed above in Table 1, General Plan Amendment Items.

CHAPTER 4 – GENERAL PLAN CONFORMANCE

Table 2 of this GPAR provides an analysis of the Tule Wind Project's consistency with the pertinent goals, objectives, and policies of all of the Elements of the General Plan, the Mountain Empire Subregional Plan, and the Boulevard Plan.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Land Use Element		
The Community Development Model		
GOAL LU-1 Primacy of the Land Use Element. A land use plan and development doctrine that sustain the intent and integrity of the community Development Model and the boundaries between Regional Categories.	**LU-1.1 Assigning Land Use Designations.** Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.	**Not Applicable.** The applicant is not proposing to change the underlying land use designation of the property.
	LU-1.2 Regional Categories Map Amendments. Avoid General Plan and Specific Plan amendments requiring a change to the Regional Categories Map unless the changes are part of a County-initiated comprehensive General Plan Update.	
	LU-1.3 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.	
	LU-1.4 Leapfrog Development. Prohibit leapfrog development which is inconsistent with the Community Development Model. Leapfrog Development restrictions do not apply to new villages that are designed to be consistent with the Community Development Model, that provide necessary services and facilities, and that are designed to meet the LEED-Neighborhood Development Certification or an equivalent. For purposes of this policy, leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. [*See applicable community plan for possible relevant policies*.]	**Consistent.** The proposed wind project does not include housing. The project is sited to take advantage of the high wind resources throughout the McCain Valley, and would not be considered "leapfrog" development.
	LU-1.5 Development Patterns. Designate land use designations in patterns to create or enhance communities and preserve surrounding rural lands.	**Not Applicable.** See response to Policy LU-1.1 of the Land Use Element above.
	LU-1.6 Village Expansion. Permit new Village Regional Category designated land uses only where contiguous with an existing or planned Village and where all of the following criteria are met: • Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding • Potential Village development would be accommodated by the General Plan road network • Public facilities and services can support the expansion without a reduction of services to other County residents • The expansion is consistent with community character, the scale, and the orderly and contiguous growth of a Village area	**Not Applicable.** This Policy requires action by the County, and does not imply action by the applicant. The project is not within an existing village.
	LU-1.7 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as the primary precedent or justification for adjusting land use designations of unincorporated County lands. Coordinate with adjacent cities to ensure that land use designations are consistent with existing and planned infrastructure capacities and capabilities.	**Not Applicable.** The project is not proposed within or near a Sphere of Influence of an incorporated city
	LU-1.8 Density Allocation on Project Sites. Permit changes in density within a project site with parcels that have more than one land use designation to provide flexibility in project design only when approved by Major Use Permit or Specific Plan. The policy does not allow a project to receive more units than is established by the Land Use Maps nor to supersede Housing Element requirements related to achieving the County's Regional Housing Needs Allocation. [*See applicable community plan for possible relevant policies*.]	**Not Applicable.** The project does not include residential development which would require permitting of dwelling units or changes in density.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	LU- 1.9 Maximum Residential Densities. Determine the maximum number of dwelling units permitted within the boundaries of any subdivision or single lot based on the applicable land use designation(s). When the total number of dwelling units is less than one, this shall be interpreted as permitting one dwelling unit. When more than one dwelling unit is permitted, fractional dwelling units are rounded down to the nearest whole number of dwelling units.	
GOAL LU-2 **Maintenance of the County's Rural Character.** Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.	**LU-2.1 Community Plans.** Maintain updated Community Plans, as part of the General Plan, to guide development to reflect the character and vision for each individual unincorporated community, consistent with the General Plan.	**Not Applicable.** This Policy requires action by the County, and does not imply action by the applicant.
	LU-2.2 Relationship of Community Plans to the General Plan. Community Plans are part of the General Plan. These plans focus on a particular region or community within the overall General Plan area. They are meant to refine the policies of the General Plan as they apply to a smaller geographic region and provide a forum for resolving local conflicts. As legally required by State law, Community Plans must be internally consistent with General Plan goals and policies of which they are a part. They cannot undermine the policies of the General Plan. Community Plans are subject to adoption, review and amendment by the Board of Supervisors in the same manner as the General Plan.	**Not Applicable.** This Policy requires action by the County, and does not imply action by the applicant.
	LU-2.3 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that is compatible with the character of each unincorporated community.	**Not Applicable.** New lots are not proposed as part of the project; therefore, density standards are not applicable.
	LU-2.4 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.	**Not Applicable.** This policy refers to changes to land uses and densities within any Regional Category or Land Use Designation, and the applicant is not requesting any changes to a Regional Category or Land Use Designation.
	LU-2.5 Greenbelts to Define Communities. Identify and maintain greenbelts between communities to reinforce the identity of individual communities.	**Not Applicable.** There are no existing greenbelts or established communities to identify near the project area.
	LU-2.6 Development Near Neighboring Jurisdictions. Require that development in the proximity of neighboring jurisdictions retain the character of the unincorporated community and use buffers or other techniques where development in the neighboring jurisdiction is incompatible.	**Not Applicable.** See response to Policy LU-1.7 of the Land Use Element above.
	LU-2.7 Commercial Viability. Ensure that new commercial centers maintain or enhance the viability of existing commercial areas.	**Not Applicable.** Commercial uses are not proposed as part of the project. The project area is not within a commercial area.
	LU.2-8: Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment, and/or are detrimental to human health and safety.	**Consistent.** The applicant has proposed APMs and would implement mitigation measures to minimize environmental impacts associated with the construction and operation of the wind turbines and the 3-mile segment of the 138 kV transmission line under County of San Diego jurisdiction. With implementation of mitigation,

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		the visual contrasts, public safety, and noise impacts associated with construction of wind turbines and the 138 kV transmission line would be minimized to the extent feasible and, therefore, project components under County land use jurisdiction would be consistent with this policy.
	LU-2.9 Maintaining Rural Character. Consider level of service criteria, in accordance with Policy M-2.1, to determine whether adding lanes to a Mobility Element road would adversely impact the rural character of a community or cause significant environmental impacts. In those instances, consider other options to mitigate LOS where appropriate.	**Consistent.** See response to Policy LU-2.4 of the Land Use Element above. LOS will not be adversely affected as a result of the project. The applicant is not adding new lanes to a Mobility Element road that would adversely impact the rural character of the community.
GOAL LU-3 **Diversity of Residential Neighborhoods.** A land use plan that accommodates a range of building and neighborhood types suitable for a variety of lifestyles, ages, affordability levels, and design options.	**LU-3.1 Diversity of Residential Designations and Building Types.** Maintain a mixture of residential land use designations and development regulations that accommodate various building types and styles.	**Not Applicable.** New lots or dwelling units are not proposed as part of the project; therefore, building or planned development standards are not applicable.
	LU-3.2 Mix of Housing Units in Large Projects. Require new large residential developments (generally greater than 200 dwelling units) to integrate a range of housing types and lot and building sizes. [*See applicable community plan for possible relevant policies*.]	
	LU-3.3 Complete Neighborhoods. Require new development sufficiently large to establish a complete neighborhood (typically more than 1,000 dwelling units) to include a neighborhood center within easy walking distance of surrounding residences. [*See applicable community plan for possible relevant policies*.]	
GOAL LU-4 **Inter-jurisdictional Coordination.** Coordination with the plans and activities of other agencies and tribal governments that relate to issues such as land use, community character, transportation, energy, other infrastructure, public safety, and resource conservation and management in the unincorporated County and the region.	**LU-4.1 Regional Planning.** Participate in regional planning to ensure that the unique communities, assets, and challenges of the unincorporated lands are appropriately addressed with the implementation of the planning principles and land use requirements, including the provisions of SB375.	**Not Applicable.** These Policies require action by the County, and do not imply action by the applicant. See response to Policy LU-4.3 of the Land Use Element below.
	LU-4.2 Review of Impacts of Projects in Adjoining Jurisdictions. Review, comment, and coordinate when appropriate on plans, projects, and proposals of overlapping or neighboring agencies to ensure compatibility with the County's General Plan, and that adjacent communities are not adversely impacted.	
	LU-4.3 Relationship of Plans in Adjoining Jurisdictions. Consider the plans and projects of overlapping or neighboring agencies in the planning of unincorporated lands, and invite comments and coordination when appropriate.	**Consistent.** Portions of the Tule Wind Project are proposed on publicly owned lands (BLM and State), in addition to tribal and private lands. The portions of the project regulated by the BLM, State and Bureau of Indian Affairs (BIA) will be developed in accordance with the applicable development guidelines and regulations for each respective agency.
	LU-4.4 Development Compatibility with Military Facilities. Ensure compatibility of new development with the current and planned mission and operations of U.S. government military installations.	**Consistent.** The proposed project will not hinder the ability of the U.S. government to fulfill its mission.
	LU-4.5 Annexations with Incompatible Land Uses. Coordinate with LAFCO to oppose annexations by	**Not Applicable.** An annexation is not proposed

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Goals & Objectives	Policies	Consistency Analysis
	neighboring cities that would result in land uses incompatible with unincorporated lands.	as part of the project.
	LU-4.6 Planning for Adequate Energy Facilities. Participate in the planning of regional energy infrastructure with applicable utility providers to ensure plans are consistent with the County's General Plan and Community Plans and minimize adverse impacts to the unincorporated County.	**Consistent.** The applicant is coordinating with SDG&E on the interconnection of the proposed project to the Rebuilt Boulevard Substation in Boulevard. The CPUC is the lead agency for the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects EIR/EIS. The applicant is working with all affected interests and parties to develop the projects in accordance with the County's General Plan, with the least amount of environmental impacts.
	LU-4.7 Airport Land Use Compatibility Plans (ALUCP). Coordinate with the Airport Land Use Commission (ALUC) and support review of Airport Land Use Compatibility Plans (ALUCP) for development within Airport Influence Areas.	**Not Applicable.** The project is not within an Airport Influence Area.
Planning for Sustainability		
GOAL LU-5 **Climate Change and Land Use.** A land use plan and associated development techniques and patterns that reduce emissions of local greenhouse gases in accordance with state initiatives, while promoting public health.	**LU-5.1 Reduction of Vehicle Trips within Communities.** Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate.	**Not Applicable.** See response to Goal LU-3 and associated policies of the Land Use Element above.
	LU-5.2 Sustainable Planning and Design. Incorporate into new development sustainable planning and design.	
	LU-5.3 Rural Land Preservation. Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi Rural Land Use Designations.	**Consistent.** The applicant designed the project in consideration of the existing natural resources throughout the project area; and sensitive environmental resources will be avoided to the extent practicable. Impacts to natural resources are minimized by virtue of the project design, and no unmitigated impacts to natural resources would occur. Construction of the turbines and transmission line would not jeopardize the preservation of existing open space and rural areas in the project area. The project is consistent with the provisions of the County's Resource Protection Ordinance and Biological Mitigation Ordinance. Although construction and operation of 7 turbines and the 3-mile segment of the 138 kV transmission line located under County of San Diego land use jurisdiction would result in impacts to the natural environment, these project

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		components would indirectly work toward preserving the natural environment by producing and transmitting renewable energy. In addition, these components of the Tule Wind Project would help the County of San Diego accomplish its Sustainable Energy Goal COS-18 as established in this Conservation and Open Space Element.
	LU-5.4 Planning Support. Undertake planning efforts that promote infill and redevelopment of uses that accommodate walking and biking within communities.	**Not Applicable.** This Policy requires action by the County, and does not imply action by the applicant.
	LU-5.5 Projects that Impede Non-Motorized Travel. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.	**Consistent.** The project may result in temporary impacts to the existing bike route along Old Highway 80 during the construction and decommissioning phases of the project. However, the implementation of a Traffic Control Plan would provide mitigation in the form of safety measures and directional guidance to detour bicyclists to a safer route along the roadway during construction and reduce potential impacts to a level less than significant level.
GOAL LU-6 Development—Environmental Balance. A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.	**LU-6.1 Environmental Sustainability.** Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.	**Consistent.** See response to Policy LU-5.3 of the Land Use Element above
	LU-6.2 Reducing Development Pressures. Assign lowest-density or lowest-intensity land use designations to areas with sensitive natural resources.	**Not Applicable.** The applicant is not proposing to change the underlying land use designation of the property.
	LU-6.3 Conservation-Oriented Project Design. Support conservation-oriented project design. This can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with corresponding requirements for preserved open space (Planned Residential Developments). Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character.	**Consistent.** See response to Policy LU-12.4 of the Land Use Element and Policy COS-11.3 of the Conservation and Open Space Element below.
	LU-6.4 Sustainable Subdivision Design. Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities consistent with the applicable community plan.	**Not Applicable.** See response to Goal LU-3 and associated policies of the Land Use Element above.
	LU-6.5 Sustainable Stormwater Management. Ensure that development minimizes the use of impervious surfaces and incorporates other Low Impact Development (LID) techniques as well as a combination of site design, source control, and stormwater best management practices, where applicable and consistent with the County's LID Handbook.	**Consistent.** Minimal impervious surfaces will be created as part of project implementation. The only components of the project with impervious surfaces will be the turbine foundations. A Stormwater Management Plan (SWMP) was

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		prepared and recommended site design, source control, and treatment BMPs will be implemented to improve surface water quality to the maximum extent practicable and reduce potential for water degradation or erosion impacts.
	LU- 6.6 Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.	**Consistent.** Natural features would be incorporated into the design of the Tule Wind Project and sensitive environmental resources will be avoided to the extent practicable. However, due to the type of project proposed and the linear nature of the 138 kV transmission line, the incorporation of mature oaks, trees, and rock formations would not be practical around these project components.
	LU-6.7 Open Space Network. Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.	**Consistent.** Open space areas are not proposed as part of the project; however, the project traverses only a portion of the overall affected parcels. This policy relates to the use of project open space areas, and the Tule Wind Project will comply with the use of its open space areas in the manner designated by the policy. The *Draft Biological Technical Report* and *Draft Biological Technical Memorandum for the Tule Wind Project* both acknowledge that The Department of Planning and Land Use (DPLU) wildlife movement modeling of connectivity has shown The Tule Wind Project area to be an important wildlife linkage within East San Diego County. Potential impacts are analyzed in Sections 2.3.1, 3.3.1 and 6.0 of the *Draft Biological Technical Report*. The construction and operation of the proposed project will not interfere with the movement of any native wildlife species or interfere with known migration corridors. The compensatory mitigation detailed in the Conceptual Mitigation Plan for the Tule Wind Project is designed to provide for long-term suitable habitat use by the impacted species that may be subject to potential impacts resulting from the Tule Wind Project.
	LU-6.8 Oversight of Open Space. Require that open space associated with future development that is intended to be preserved in perpetuity either be: 1) Retained in private ownership of the property owner or a third party with a restrictive easement that limits use of the land as appropriate; or Require that open space associated with future development that is intended to be preserved in perpetuity either be: 2) Transferred into public ownership of an agency that manages preserved open space. The owner of the open space will be responsible for the maintenance and any necessary management unless those responsibilities are delegated through an adopted plan or agreement. Restrictive easements shall be dedicated to the County or a public agency (approved by the County) with responsibilities that correspond with the purpose of the open space. When transferred to a third party or public agency, a funding mechanism to support the future maintenance and management of the property should be established to the satisfaction of the County.	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		Implementation of mitigation measures identified in the EIR/EIS will reduce potential impacts to scenic highways, scenic vistas, or scenic resources to the maximum extent feasible. There are no County recreational facilities in the project area. However, the Tule Wind Project will not conflict with existing or planned recreational areas or events throughout the project area on BLM lands.
	LU-6.9 Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.	**Consistent.** Natural topography would be incorporated into the design of the Tule Wind Project to the extent practicable. Implementation of Mitigation Measure HYD-6 (Preparation of a Stormwater Management Plan) would require the applicant to incorporate Low-Impact Development Features into the project design to ensure that existing drainage patterns are not significantly altered. With implementation of Mitigation Measure HYD-6, components of the Tule Wind Project under County jurisdiction would be consistent with this policy.
	LU-6.10 Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.	The *CEQA Drainage Study* prepared for the project concludes that project impacts (from a flood impact standpoint) are determined to be negligible. Risk of landslides, earthflows, rockfall, and/or subsidence as a result of the Tule Wind Project would be avoided and/or minimized through implementation of mitigation measures identified in the EIR/EIS. The potential for landslides is low for project components under the jurisdiction of the County; however, geotechnical studies would cover the entire project area, not only those areas containing steep slopes. Through implementation of mitigation, existing drainage patterns would not be significantly altered, and occurrences of increased erosion and siltation will be reduced to a level less than significant.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		The applicant developed a multi-agency Fire Protection Plan (FPP) for the Tule Wind Project. See response to Policy LU-6.11 of the Land Use Element below.
	LU-6.11 Protection from Wildfires and Unmitigable Hazards. Assign land uses and densities in a manner that minimizes development in extreme, very high and high hazard fire areas or other unmitigable hazardous areas.	**Consistent.** The applicant developed a multi-agency FPP for the Tule Wind Project. The FPP was approved by the San Diego Rural Fire Protection District (SDRFPD) in November 2010 and accepted by the San Diego County Fire Authority (SDCFA) in February 2011. The applicant and the SDRFPD entered into a Fire and Emergency Protection Services agreement on November 2, 2010. The applicant is currently in negotiations with the SDCFA to finalize a Fire Services Agreement for provision of fire services within the County CSA-135. Upon certification of the FEIR/FEIS, and prior to the project being heard by the County Board of Supervisors, the applicant and the SDCFA will finalize negotiations on the agreement. The project design features and mitigation measures proposed to minimize the potential for an ignition include: automatic fire suppression systems in the wind turbine nacelle(s), various design features such as arc flash relays, fuel management around project features (i.e., 100' clearance around turbines with fire-safe vegetation and annual fuel management), four (4) 10,000 gallon water storage tanks installed throughout the project area that can be utilized for regional fire suppression support, training of both construction and operational personnel by SDRFPD personnel, or another entity certified to conduct such training, on the proper use of Type VI firefighting equipment to fight incipient fires, and funding for both the SDCFA and the SDRFPD for training and acquisition of fire equipment and apparatus. Not only has the project applicant minimized the risk of potential ignition sources resulting from the project, but it will also improve access and response times throughout the project area, and provide water

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		for wildland firefighting within the large expanse of BLM lands that do not currently have access or water. Implementation of APMs and mitigation measures would reduce the fire risk and probability of a wildfire to a level less than significant. The FPP requires, among other things, the implementation of additional measures and project design features at the project site to further reduce fire risk and improve the response and firefighting effectiveness throughout the project area and surrounding community. The applicant will also develop a Construction Fire Prevention and Protection Plan in accordance with mitigation measures identified in the EIR/EIS. All construction work on the project will follow the Construction Plan guidelines and commitments, and plan contents will be incorporated into the standard construction contracting agreements. At a minimum, plan contents will include the requirements of Title 14 of the California Code of Regulations, Article 8 #918 "Fire Protection."
	LU-6.12 Flooding. Document and annually review areas within floodways and 100- and 200-year floodplains to ensure areas subject to flooding are accurately mapped in accordance with AB 162 (enacted January 1, 2008). (*See also Policy S-8.1*)	**Consistent.** Please refer to response to LU-6.9 of the Land Use Element above.
GOAL LU-7 **Agricultural Conservation.** A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.	**LU-7.1 Agricultural Land Development.** Protect agricultural lands with lower-density land use designations that support continued agricultural operations.	**Consistent.** Agricultural uses are not proposed as part of the Tule Wind Project, nor are the proposed turbines and associated 138 kV transmission line located within any active agriculture farm. The project would be compatible with current and future agricultural uses located throughout the project area. Agricultural uses are permitted around the proposed facilities; and therefore, agricultural uses would be compatible with the proposed project.
	LU-7.2 Parcel Size Reduction as Incentive for Agriculture. Allow for reductions in lot size for compatible development when tracts of existing historically agricultural land are preserved in conservation easements for continued agricultural use.	
GOAL LU-8 **Aquifers and Groundwater Conservation.**	**LU-8.1 Density Relationship to Groundwater Sustainability**. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.	**Consistent.** The *Groundwater Investigation Report* concludes that onsite wells have a sufficient supply of groundwater available for the

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Sustainable aquifers and functional groundwater recharge areas.	**LU-8.2 Groundwater Resources.** Require development to identify adequate groundwater resources in groundwater dependent areas, as follows: ■ In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley. ■ In areas without current overdraft groundwater conditions, evaluate new groundwater-dependent development to assure a sustainable long-term supply of groundwater is available that will not adversely impact existing groundwater users.	project demands. Results of the groundwater investigation conservatively indicate that combined groundwater from the tested Rough Acres Ranch Wells No. 6 and 6a can support sustained pumping at 100 gpm; Rough Acres Ranch Well No. 8 can support sustained pumping of 18 gpm; and the tested Ewiiaapaayp Reservation North well can also support sustained pumping of 18 gpm. Together these wells could provide a peak groundwater volume of up to 136 gpm and total groundwater supply of up to 164 acre-feet, exceeding the estimated project peak groundwater demand of 117 to 124 gpm and total groundwater demand of 58 acre-feet. A Major Use Permit is pending for onsite groundwater extraction.
	LU-8.3 Groundwater-Dependent Habitat. Discourage development that would significantly draw down the groundwater table to the detriment of groundwater-dependent habitat, except in the Borrego Valley.	**Consistent.** Under conservative conditions, the radius of influence surrounding Wells No. 6 and 6a (2 of the 3 groundwater extraction wells proposed as part of the Tule Wind Project) creates a calculated drawdown of 3.64 feet at the closest property line (439 feet) after nine months of pumping at 50 gpm, or 7.28 feet at the closest property line if the pumping rate is doubled to 100 gpm for the entire nine-month construction period, and indicating no significant well interference associated with groundwater pumping at this location. Results of the groundwater demand and depletion analysis during a seven year drought period indicate that eight times the anticipated groundwater would have to be pumped to drawdown groundwater to the 50 percent depletion level. In addition, using the data from Wells No. 6 and 6a and well data from the pumping test at Well No. 8, no significant impacts are anticipated associated with pumping at Well No. 8, especially considering that there are no known wells within

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Goals & Objectives	Policies	Consistency Analysis
		2500 feet of this well. The proposed project would not result in significant drawdown of the groundwater table to result in detrimental impacts to groundwater-dependent habitat.
	LU-8.4 Program for Borrego Valley Aquifer. Support the Borrego Valley Water District with their program to slow the over drafting and extend the life of the aquifer supporting the residents of the Borrego Valley.	**Not Applicable.** The project would not result in significant drawdown of the groundwater table
Village and Town Centers		
The intent of the Policies of the Village and Town Centers component of the Land Use Element align with the overall Goal LU-9 for Villages and Town Centers; to provide for well-defined, well-planned, and well-developed community cores, such as Villages and Town Centers that contribute to a community's identity and character.		**Not Applicable.** The project is not a residential project and new lots are not proposed as part of the project; therefore, clustering, smart growth, or planned development standards are not applicable.
Semi-Rural/Rural Lands		
GOAL LU-10 **Function of Semi-Rural and Rural Lands.** Semi-Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate unique rural communities.	**LU-10.1 Residential Connectivity.** Require residential development in Semi-Rural areas to be integrated with existing neighborhoods by providing connected and continuous street, pathway/trail, and recreational open space networks.	**Not Applicable.** The project is not a residential project and new pathways/trails, and/or recreational open space is not proposed.
	LU- 10.2 Development—Environmental Resource Relationship. Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.	**Consistent.** See response to Policy LU-2.4 and Policy LU-5.3 of the Land Use Element above. The Tule Wind Project would be developed in rural areas of the County but would respect and conserve the rural character and unique natural features as discussed in response to Policy LU-2.4 and Policy LU-5.3 above. The Tule Wind Project will pose a less than significant fire risk after mitigation (Class II impact). Accordingly, the project will be consistent with this policy because it would not exacerbate an already existing hazard in the high and very high fire hazard zones around the project area. The focus of the policy is on minimizing impacts to the environment, which the Tule Wind Project will do by implementing a variety of measures to reduce fire risk below a level of significance.

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Goals & Objectives	Policies	Consistency Analysis
		In addition, the General Plan Safety Element (Section C.7) acknowledges that "because most of the unincorporated County is located within very high or extreme fire threat areas, avoiding high threat areas is not possible (Figure S-1 [Fire Threat])." GPU, at C.7.7-5. Accordingly, Policy LU-10.2 should not be read as requiring complete avoidance of fire hazard areas.
	LU-10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and Rural Land Use designations to serve as buffers between communities.	**Not Applicable.** This Policy requires action by the County, and does not imply action by the applicant. Changes to the underlying land use designation of the project area are not proposed as part of the GPA.
	LU-10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.	**Consistent.** The project does not include traditional industrial uses (manufacturing, warehousing, coal power plants, refineries, etc) as part of the project; and should therefore not be considered an industrial use. Project components under the County's jurisdiction would not significantly impact the Semi-Rural and Rural areas of the Boulevard community as the proposed turbines would be passive in nature. The project would not result in significant long-term expansion of jobs and housing in the area, and the wind turbines operate without significant human intervention. Implementation of mitigation measures identified in the EIR/EIS will minimize potential environmental impacts associated with the proposed project.
Commercial, Office, and Industrial Development		
GOAL LU-11 **Commercial, Office, and Industrial Development.** Commercial, office, and industrial development that is appropriately sited and designed to enhance the unique character of each unincorporated community and to minimize vehicle trip lengths.	**LU-11.1 Location and Connectivity.** Locate commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods, whenever feasible.	**Not Applicable.** The proposed project is not a commercial, office, or industrial development, but rather a utility-scale renewable energy project. It would not be feasible to locate the project within a village.
	LU-11.2 Compatibility with Community Character. Require that commercial, office, and industrial development be located, scaled, and designed to be compatible with the unique character of the community.	**Consistent.T**he project is consistent with the policy because it does not propose a commercial or industrial development.
	LU-11. 3 Pedestrian-Oriented Commercial Centers. Encourage the development of commercial	**Not Applicable.** Commercial, office, or

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Goals & Objectives	Policies	Consistency Analysis
	centers in compact, walkable configurations in Village centers that locate parking in the rear or on the side of the parcel, use transparent storefronts with active retail street-fronting uses, minimize setbacks, and discourage "strip" commercial development. "Strip" commercial development consists of automobile-oriented commercial development with the buildings set back from the street to accommodate parking between the building and street.	secondary uses are not proposed as part of the project.
	LU-11.4 Town Center Intensity and Vitality. Encourage revitalization of Town Center areas to strengthen neighborhoods, expand local employment opportunities, and establish or enhance a sense of place.	
	LU-11.5 Large-Format Retail Stores. Allow large-format retail uses, typically referred to as "big box stores," only where the scale of the use and design is compatible with the surrounding areas. Large-format retail typically means retail stores with floor plans that are larger than 65,000 sq. ft.	
	LU-11.6 Office Development. Locate new office development complexes within Village areas where services are available, in proximity to housing, and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the multi-modal transportation network where feasible.	
	LU-11.7 Office Development Compatibility with Adjoining Uses. Require new office development, including office parks, to be compatible to the scale, design, site layout, and circulation patterns of adjacent existing or planned commercial and residential development.	
	LU-11.8 Permitted Secondary Uses. Provide a process where secondary land uses may be permitted when appropriate and compatible with the primary commercial, office, and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips. This policy is not intended for high impact industrial uses.	
	LU-11.9 Development Density and Scale Transitions. Locate transitions of medium-intensity land uses or provide buffers between lower intensity uses, such as low-density residential districts and higher intensity development, such as commercial or industrial uses. Buffering may be accomplished through increased setbacks or other techniques such as grade differentials, walls, and/or landscaping but must be consistent with community design standards.	**Consistent.** Adequate buffers to protect adjacent uses and nearby residences have been incorporated into the project design. There are no schools or sensitive uses located in the project area. Proposed setbacks for wind turbines associated with the Tule Wind Project located on land subject to County land use jurisdiction are as follows: a) four (4) times turbine tip height from any existing residence or buildings occupied by civic use types, when measured from center of turbine to residence or building occupied by civic use type; and b) 101% of the blade length from any adjacent property line of a property owner

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		that is participating in the project analyzed in the EIR/EIS, when measured from center of turbine to property line; unless either (i) written consent signed by the owner(s) of each lot or parcel affected by the proposed setback reduction is obtained or (ii) the lot or parcel affected by the proposed setback is owned by the Bureau of Land Management or other state or federal agency that participated in the preparation of such EIR/EIS; and c) 131% of the turbine tip height from any adjacent property line of a property owner that is not participating in the project analyzed in the EIR/EIS, when measured from center of turbine to property line; unless either (i) written consent signed by the owner(s) of each lot or parcel affected by the proposed setback reduction is obtained or (ii) the lot or parcel affected by the proposed setback is owned by the Bureau of Land Management or other state or federal agency that participated in the preparation of such EIR/EIS; and d) 131% of the turbine tip height to edge of public road right-of-way when measured from center of turbine; and e) 101% of turbine tip height to edge of transmission line easement or right-of-way when measured from center of turbine. Wind turbines located on land outside of the County's land use jurisdiction are not required to comply with these standards.
	LU-11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.	**Consistent.** The project is not an industrial use and is not located in an industrial zoned area designated for Medium or High impact Industrial Uses. However, adequate buffers to protect

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Goals & Objectives	Policies	Consistency Analysis
		adjacent uses and nearby residences have been incorporated into the project design (see response to Policy LU-11.9 of the Land Use Element above.
	LU-11.11 Industrial Compatibility with Adjoining Uses. Require industrial land uses with outdoor activities or storage to provide a buffer from adjacent incompatible land uses (refer to Policy LU-11.9 for examples of buffering).	**Consistent.** The proposed project is not an industrial use, but it is compatible with the land uses and existing development in the surrounding area. During construction, outdoor activities will occur and mitigation measures will be implemented to avoid or minimize impacts to the surrounding landowners and nearby residences. Noise barriers may be provided as a buffer to nearby residences for the project to comply with the County's Noise Ordinance. The O&M Building may have some outside storage; however, outdoor storage maintenance activities would not cause an incompatibility of land use.
Community Services and Infrastructure		
GOAL LU-12 **Infrastructure and Services Supporting Development.** Adequate and sustainable infrastructure, public facilities, and essential services that meet community needs and are provided concurrent with growth and development.	**LU-12.1 Concurrency of Infrastructure and Services with Development.** Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.	**Consistent.** Water - Groundwater is proposed to be extracted from three onsite wells, providing an efficient and economical means of groundwater supply for the project. The project would not require extension of water service. See response to Goal LU-8 and associated Policies LU-8.1 – LU-8.3 of the Land Use Element above. Sewer - A septic system will be developed to serve the O&M building. The project would not require extension of sewer service. Fire - Fire protection services will be provided by the SDRFPD and the SDCFA. The applicant has obtained approval of a FPP for the project, and is in the process of establishing agreements with these agencies for ongoing fire protection service

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Goals & Objectives	Policies	Consistency Analysis
		for the project throughout operation. Roadways - The applicant would provide improvements to County roadways (portions of McCain Valley Road and Ribbonwood Road) in order to promote orderly development and to provide construction access to the project area on BLM lands. Construction of new roads associated with the Tule Wind Project will also enable firefighters to reach backcountry areas to put out wildfires, and also provide a second evacuation route from the McCain Valley. The applicant will execute an Irrevocable Offer of Dedication with the County for the east/west connector road. Additional Public Services – The project is not anticipated to increase demand for schools, libraries, or law enforcement services. Additionally, the project would not impact solid waste collection or landfill capacity, nor would the project adversely affect the provision of parkland for future residents. However, the Tule Wind Project could be subject to development impact fees imposed on new development. If such a fee is deemed necessary by the County then the applicant would be required to pay the fee as the County would be a permitting agency.
	LU-12.2 Maintenance of Adequate Services. Require development to mitigate significant impacts to existing service levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved LOS but do not achieve a LOS of D or better.	**Consistent.** The project would not require the provision of additional public services or result in impacts to existing service levels of public facilities or services for existing residents and businesses. Due to the project area being prone to wildfires, the applicant developed a multi-agency FPP for the proposed project. See response to Policy LU-6.11 of the Land Use Element above. Roads within the project area will be improved in accordance with DPW private road standards. Improvements to existing roads identified in the Mobility Element Network Appendix are not

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Goals & Objectives	Policies	Consistency Analysis
		proposed.
	LU-12.3 Infrastructure and Services Compatibility. Provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities. Encourage the collocation of infrastructure facilities, where appropriate.	**Consistent.** Water - Groundwater is proposed to be extracted from three onsite wells, providing an efficient and economical means of groundwater supply for construction and operation of the project. The project would not require extension of water service. The *Groundwater Investigation Report* concludes there is sufficient groundwater available to support the project without significant impact to offsite water users. Furthermore, The groundwater data obtained from the well testing program, indicates that there is a significant volume of groundwater in storage within McCain Valley and pumping at 100 gpm – over a nine month construction period will not reduce the total available volume of water within storage significantly (i.e., below the County's 50% depletion threshold), especially over the relatively short construction period when peak water demand is required. Sewer - A septic system will be developed to serve the O&M building. The project would not require extension of sewer service. An On-Site Wastewater Treatment System Permit may be required for the proposed O&M building in accordance with the permit requirements of the County of San Diego Department of Environmental Health (DEH). Fire - Fire protection services will be provided by the SDRFPD and the SDCFA. The applicant has obtained approval of a FPP for the project, and is in the process of establishing agreements with these agencies for ongoing fire protection service for the project throughout operation. Roadways - The applicant would provide improvements to County roadways (portions of

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		McCain Valley Road and Ribbonwood Road) in order to promote orderly development and to provide construction access to the project area on BLM lands. New roads associated with the Tule Wind Project will be designed to conform with the topography to the greatest extent possible and grading required to construct these roadways will be minimized. Electricity – The138 kV transmission line is proposed adjacent to the route of the approved Sunrise Powerlink. The proposed transmission line was sited adjacent to this corridor to minimize potential visual impacts and facilitate efficient transmission of energy generated from the Tule Wind Project. The 138 kV transmission line is proposed to be a single circuit or double circuit overhead line to accommodate future renewable energy projects in the surrounding area. Subsequent environmental impacts would be significantly reduced by collocating future transmission lines on transmission line poles associated with the Tule Wind Project. Additional Public Services – The project is not anticipated to increase demand for schools, libraries, or law enforcement services. Additionally, the project would not impact solid waste collection or landfill capacity, nor would the project adversely affect the provision of parkland for future residents.
	LU-12.4 Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.	**Consistent.** The Tule Wind Project is not proposed on any agricultural preserves or open space easements. Project components located on lands within the land use jurisdiction of the County of San Diego have been sited to avoid impacts to natural resources by virtue of the project design, and no unmitigated impacts to natural resources would occur. The project is consistent with the provisions of the County's Resource Protection Ordinance and Biological

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		Mitigation Ordinance. The applicant will implement mitigation measures identified in the EIR/EIS to minimize visual and environmental impacts and preserve the natural contours, channels, and visual character of project site to the maximum extent feasible. The proposed project would not significantly impact the existing character of the project area; and no unmitigated impact to community character has been identified.
GOAL LU-13 **Adequate Water Quality, Supply, and Protection.** A balanced and regionally integrated water management approach to ensure the long-term viability of San Diego County's water quality and supply.	**LU-13.1 Adequacy of Water Supply.** Coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high quality sustainable water supply. Ensure that new development includes both indoor and outdoor water conservation measures to reduce demand.	**Consistent.** See response to Goal LU-8 and associated Policies LU-8.1 – LU-8.3 of the Land Use Element above.
	LU-13.2 Commitment of Water Supply. Require new development to identify adequate water resources, in accordance with State law, to support the development prior to approval.	
GOAL LU-14 **Adequate Wastewater Facilities**. Adequate wastewater disposal that addresses potential hazards to human health and the environment.	**U-14.1 Wastewater Facility Plans.** Coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County's land use plans.	**Consistent.** The project area is not serviced by a wastewater service provider, and the extension of utilities is not proposed as part of the project. The O&M building will utilize a septic system for sewage conveyance and disposal; and appropriate permits will be applied for with the Department of Environmental Health as necessary.
	LU-14.2 Wastewater Disposal. Require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands.	
	LU-14.3 Wastewater Treatment Facilities. Require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. Coordinate the planning and design of such facilities with the appropriate agency to be consistent with applicable sewer master plans.	
	LU-14.4 Sewer Facilities. Prohibit sewer facilities that would induce unplanned growth. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map. Sewer systems and services shall not be extended beyond either Village boundaries or extant Urban Limit Lines, whichever is more restrictive, except: ■ When necessary for public health, safety, or welfare. ■ When within existing sewer district boundaries; ■ When necessary for a conservation subdivision adjacent to existing sewer facilities; or ■ Where specifically allowed in the Community Plan.	
	LU-14.5 Alternate Sewage Disposal Systems. Support the use of alternative on-site sewage disposal systems when conventional systems are not feasible and in conformance with State guidelines and regulations.	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
GOAL LU-15 **Adequate Wireless Communication Facilities.** Wireless telecommunication facilities that utilize state-of-the-art techniques to minimize impacts to communities and the environment.	**LU-15.1 Telecommunication Facilities Compatibility with Setting.** Require that wireless telecommunication facilities be sited and designed to minimize visual impacts, adverse impacts to the natural environment, and are compatible with existing development and community character.	**Not Applicable.** Wireless telecommunication facilities are not proposed as part of the project.
	LU-15.2 Co-Location of Telecommunication Facilities. Encourage wireless telecommunication service providers to co-locate their facilities whenever appropriate, consistent with Community Plans and the Zoning Ordinance.	
GOAL LU-16 **Appropriately Sited Waste Management Facilities.** Solid waste management facilities that are appropriately located and sited in a manner that minimizes environmental impacts and potential conflicts from incompatible land uses, while facilitating recycling and resource recovery activities.	**LU-16.1 Location of Waste Management Facilities.** Site new solid waste management facilities identified in the San Diego County Integrated Waste Management Plan, in a manner that minimizes environmental impacts and prevents groundwater degradation, and in accordance with applicable local land use policies.	**Not Applicable.** Solid waste facilities are not located near the project site nor are they proposed as part of the project.
	LU-16.2 Integrity of Waste Management Facilities. Avoid encroachment of incompatible land uses upon solid waste facilities in order to minimize or avoid potential conflicts.	
	LU-16.3 New Waste Management Facilities. Encourage the establishment of additional recycling and resource recovery facilities in areas with Industrial land use designations or other appropriate areas based on the type of recycling.	
GOAL LU-17 **Adequate Education.** Quality schools that enhance our communities and mitigate for their impacts.	**LU-17.1 Planning for Schools.** Encourage school districts to consider the population distribution as shown on the Land Use Map when planning for new school facilities.	**Not Applicable.** New lots or dwelling units are not proposed as part of the project; therefore, project would not result in additional school aged children entering the school system.
	LU-17.2 Compatibility of Schools with Adjoining Uses. Encourage school districts to minimize conflicts between schools and adjacent land uses through appropriate siting and adequate mitigation, addressing such issues as student drop-off/pick up locations, parking access, and security.	**Not Applicable.** There are no schools in the vicinity of the project site.
	LU-17.3 Priority School Locations. Encourage school districts to locate schools within Village or Rural Village areas wherever possible and site and design them in a manner that provides the maximum opportunity for students to walk or bicycle to school.	**Not Applicable.** New lots or dwelling units are not proposed as part of the project; therefore, project would not result in additional school aged children entering the school system.
	LU-17.4 Avoidance of Hazards. Assist school districts with locating school facilities away from fault zones, flood or dam inundation zones, and hazardous materials storage areas in conformance with State statutes.	**Not Applicable.** There are no schools in the vicinity of the project site.
GOAL LU-18 **Adequate Civic Uses.** Civic uses that enhance community centers and places.	**LU-18.1 Compatibility of Civic Uses with Community Character.** Locate and design Civic uses and services to assure compatibility with the character of the community and adjoining uses, which pose limited adverse effects. Such uses may include libraries, meeting centers, and small swap meets, farmers markets, or other community gatherings.	**Not Applicable.** The project will not impact such uses as mentioned in Policy LU-18.1. The project does not included civic uses. Included in Policy LU-18.2.
	LU-18.2 Co-Location of Civic Uses. Encourage the co-location of civic uses such as County library facilities, community centers, parks, and schools. To encourage access by all segments of the population, civic uses should be accessible by transit whenever possible.	

TABLE 2. General Plan Consistency Matrix

Mobility Element		
GOAL M-1: **Balanced Road Network.** A safe and efficient road network that balances regional travel needs with the travel requirements and preferences of local communities.	**Policy M-1.1: Prioritized Travel within Community Planning Areas.** Provide a public road network that accommodates travel between and within community planning areas rather than accommodating overflow traffic from State highways and freeways that are unable to meet regional travel demands	**Consistent.** The proposed project will not have an adverse effect on the public road network or result in the inability to meet regional travel demands.
	Policy M-1.2: Interconnected Road Network. Provide an interconnected public road network with multiple connections that improve efficiency by incorporating shorter routes between trip origin and destination, disperse traffic, reduce traffic congestion in specific areas, and provide both primary and secondary access/egress routes that support emergency services during fire and other emergencies.	**Consistent.** The proposed project would further achieve the objectives of the Mobility Element and Policy M-1.2. Implementation of mitigation measures identified in the EIR/EIS (including preparation and implementation of a traffic control plan) would ensure traffic congestion does not occur and adequate access/egress routes are available for emergency services during construction. No long-term traffic/circulation impacts were identified. Furthermore, the project includes construction of new roads that will enable firefighters to reach backcountry areas to put out wildfires, and also provide a second evacuation route from the McCain Valley. Roadway improvements will comply with the Department of Public Works (DPW) Private Road Standards and would have sufficient width for adequate emergency access.
	M-1.3 Treatment of High-Volume Roadways. Consider narrower rights-of-way, flexibility in design standards, and lower design speeds in areas planned for substantial development in order to avoid bisecting communities or town centers. Reduce noise, air, and visual impacts of new freeways, regional arterials, and Mobility Element roads, through landscaping, design, and/or careful location of facilities.	**Consistent**. The Tule Wind project will not bisect communities or town centers. New freeways, regional arterials, or improvements to Mobility Element roads are not proposed as part of the project; however, several roadways including Ribbonwood Road and McCain Valley Road would be widened to accommodate large vehicles and construction equipment during construction of the Tule Wind Project. As stated in the EIR/EIS (Section D.8, Noise) no traffic-related roadway impacts are anticipated due to project-related traffic. The Tule Wind Project will comply with the County's Noise Ordinance. Additionally, improvements to roadways will comply with the Department of Public Works Private Road Standards and the

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		project will adhere to the County roadway widths. Impacts to surrounding properties and residences will be mitigated by virtue of project design in accordance with mitigation measures identified in the EIR/EIS. The applicant will comply with all conditions of approval identified by the County of San Diego DPLU.
GOAL M-2 **Responding to Physical Constraints and Preservation Goals.** A road network that provides adequate capacity to reasonably accommodate both planned land uses and regional traffic patterns, while supporting other General Plan goals such as providing environmental protections and enhancing community character.	**M-2.1 Level of Service Criteria.** Require development projects to provide associated road improvements necessary to achieve a level of service of "D" or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with Level of Service E/F). When development is proposed on roads where a failing level of service has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.	**Consistent**. The project will create temporary, localized traffic impacts during the construction phase of the project, but no long-term traffic impacts will result during the operational phase. The addition of construction traffic generated by the project will not reduce the level of service on any of the area roadways to a level less than "C." Implementation of mitigation measures identified in the EIR/EIS (including preparation and implementation of a traffic control plan) would reduce the potential construction-related traffic impacts from the proposed project to less than significant. In addition, the new east/west access road connecting McCain Valley Road to the east and Ribbonwood Road will be a private road and not generally accessible to the public. The project will adhere to the County roadway widths and line-of-sight requirements for connection to McCain Valley Road and Ribbonwood Road to maintain public safety.
	M-2.2 Access to Mobility Element Designated Roads. Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain the capacity and improve traffic operations.	**Consistent.** As part of the project, additional roadways and access points to public roads are proposed to facilitate construction of the project, and access to transmission line poles. These roadways and driveways will be designed to conform with the topography to the greatest extent possible and grading required to construct these roadways will be minimized. Roadway improvements and access points off of public roads will comply with the DPW Private Road Standards.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	M-2.3 Environmentally Sensitive Road Design. Locate and design public and private roads to minimize impacts to significant biological and other environmental and visual resources. Avoid road alignments through floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Design new roads to maintain wildlife movement and retrofit existing roads for that purpose. Utilize fencing to reduce road kill and to direct animals to under crossings.	**Consistent.** Access roads associated with the Tule Wind Project will not significantly impact biological or visual resources. The Tule Wind Project area is not located within any FEMA designated Special Flood Hazard Area. Firm panels 06073C1800F, 06073C1825F, 06073C2075F, and 06073C2100F collectively cover the project site and indicate the project site is Zone D, area of undetermined but possible flood hazards. The Drainage report prepared for the project concludes that project impacts (from a flood impact standpoint) are determined to be negligible. The project will impact some stream crossings due to roadway access. No flood protection measures are proposed with the exception of reinforcement at grade road crossings or small portions of graded pads; although no fill or construction is proposed in any floodway; therefore, no structural flood protection methods are required. The Tule Wind Project facilities will be sited to avoid water features, and turbines will not be located in water features. Portions of the project cross ephemeral drainages that are considered non-wetland jurisdictional drainages and implementation of avoidance and mitigation measures would mitigate impacts to these jurisdictional waters. Runoff from project features would not result in flooding, and mitigation measures will be implemented to prevent new local drainage patterns resulting in off site flooding.
	M-2.4 Roadway Noise Buffers. Incorporate buffers or other noise reduction measures consistent with standards established in the Noise Element into the siting and design of roads located next to sensitive noise-receptors to minimize adverse impacts from traffic noise. Consider reduction measures such as alternative road design, reduced speeds, alternative paving, and setbacks or buffers, prior to berms and walls.	**Consistent.** As stated in the EIR/EIS (Section D.8, Noise) no traffic-related roadway impacts are anticipated due to project-related traffic. Several roadways including Ribbonwood Road and McCain Valley Road are proposed to be widened to accommodate large vehicles and equipment during construction of the Tule Wind

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		Project. Noise barriers may be provided throughout construction in order for the Tule Wind Project to comply with the County's Noise Ordinance.
	M-2.5 Minimize Excess Water Runoff. Require road improvements to be designed and constructed to accommodate stormwater in a manner that minimizes demands upon engineered stormwater systems and to maximize the use of natural detention and infiltration techniques to mitigate environmental impacts.	**Consistent.** Proposed project improvements will aim to mimic existing drainage patterns and will minimize redirection of any flows. Improvements include graded pads, access roads, utility lines, and engineered crossings at each drainage feature. Project improvements include minimal additional impervious areas. Any increase in runoff resulting from these impacts is determined to be negligible, from a flood impact standpoint. From a water quality standpoint, the SWMP prepared for the project concludes that that the project would have low potential for water quality impacts to the surrounding water bodies, and will not substantially degrade water quality. With implementation of Mitigation Measures identified in the EIR/EIS components of the Tule Wind Project under County jurisdiction would be consistent with this policy.
GOAL M-3 **Transportation Facility Development.** New or expanded transportation facilities that are phased with and equitably funded by the development that necessitates their construction.	**M-3.1 Public Road Rights-of-Way.** Require development to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network (see Mobility Element Network Appendix), Community Plans, or Road Master Plans. Require the provision of sufficient right-of-way width, as specified in the County Public Road Standards and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.	**Consistent.** The applicant would provide improvements to County roadways (portions of McCain Valley Road and Ribbonwood Road) in order to promote orderly development and to provide construction access to the project area on BLM lands. Roads within the project area will be improved in accordance with DPW private road standards. Improvements to existing roads identified in the Mobility Element Network Appendix are not proposed. The applicant will execute an Irrevocable Offer of Dedication with the County for the east/west connector road.
	M-3.2 Traffic Impact Mitigation. Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian and bicycle facilities, and equestrian.	**Consistent.** The applicant will provide mitigation in the form of payment and/or rehabilitation for roadways used throughout construction. For components under the jurisdiction of the County of San Diego, the applicant would be required to comply with all conditions of approval identified

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		by the County of San Diego DPLU and DPW, including traffic impact fees, if applicable. At this time it is unknown as to whether the County would require the payment of traffic impact fees to mitigate temporary impacts to transportation facilities during construction.
	M-3.3 Multiple Ingress and Egress. Require development to provide multiple ingress/egress routes in conformance with State law and local regulations.	**Consistent.** McCain Valley Road would be the primary access route during operation of the Tule Wind Project. The O&M facility is the only project facility that would include a permanent ingress/egress route. Access to transmission line poles would be provided throughout construction and will be intermittently used throughout operation for maintenance purposes. The project will comply with all line of sight regulations to ensure public safety is maintained throughout construction and operation. Several dirt roadways cross the project area and could also provide alternative ingress / egress in the event of an emergency.
GOAL M-4 **Safe and Compatible Roads.** Roads designed to be safe for all users and compatible with their context.	**M-4.1 Walkable Village Roads.** Encourage multi-modal roads in Villages and compact residential areas with pedestrian-oriented development patterns that enhance pedestrian safety and walkability, along with other non-motorized modes of travel, such as designing narrower but slower speed roads that increase pedestrian safety.	**Not Applicable.** The project does not involve a residential component, nor would any component be located in Villages that would warrant provision of multi-modal roads or pedestrian oriented development patterns.
	M-4.2 Interconnected Local Roads. Provide an interconnected and appropriately scaled local public road network in Village and Rural Villages that reinforces the compact development patterns promoted by the Land Use Element and individual community plans.	
	M-4.3 Rural Roads Compatible with Rural Character. Design and construct public roads to meet travel demands in Semi-Rural and Rural Lands that are consistent with rural character while safely accommodating transit stops when deemed necessary, along with bicyclists, pedestrians, and equestrians. Where feasible, utilize rural road design features (e.g., no curb and gutter improvements) to maintain community character. [See applicable community plan for possible relevant policies.]	**Consistent.** New public roads are not proposed. However, new roads would be constructed to provide access to project components and roads would be designed to be compatible with the local terrain. Roads would be designed to adhere to the natural contours to the extent feasible, and would blend with the scale of the surrounding rural development in the area (all County roads that are being improved will be restored to a 24-foot width after construction).

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	M-4.4 Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.	**Consistent.** All project roadways would be designed and constructed with sufficient width (24 feet) for fire apparatus and emergency vehicle access in accordance with the FPP prepared for the project. Project roadways will enable firefighters to reach backcountry areas to put out wildfires, and also provide a second evacuation route from the McCain Valley.
	M-4.5 Context Sensitive Road Design. Design and construct roads that are compatible with the local terrain and the uses, scale and pattern of the surrounding development. Provide wildlife crossings in road design and construction where it would minimize impacts in wildlife corridors.	**Consistent.** See response to Policy M-2.3 of the Mobility Element above.
	M-4.6 Interjurisdictional Coordination. Coordinate with adjacent jurisdictions so that roads within Spheres of Influence (SOIs) or that cross jurisdictional boundaries are designed to provide a consistent cross-section and capacity. To the extent practical, coordinate with adjacent jurisdictions to construct road improvements concurrently or sequentially to optimize and maintain road capacity.	**Consistent.** See response to Policy M-4.4 of the Mobility Element above.
GOAL M-5 **Safe and Efficient Multi-Modal Transportation System.** A multi-modal transportation system that provides for the safe, accessible, convenient, and efficient movement of people and goods within the unincorporated County.	**M-5.1 Regional Coordination.** Coordinate with regional planning agencies, transit agencies, and adjacent jurisdictions to provide a transportation system with the following: ■ Sufficient capacity consistent with the County General Plan Land Use Map ■ Travel choices, including multiple routes and modes of travel to provide the opportunity for reducing vehicle miles traveled ■ Facilities sited and designed to be compatible with the differing scales, intensities, and characteristics of the unincorporated communities while still accommodating regional, community, and neighborhood travel demands ■ Maximized efficiency to enhance connectivity between different modes of travel	**Consistent.** Roadways identified for improvement would be constructed to a consistent width across adjacent jurisdictions. For example, McCain Valley Road, which would cross County of San Diego and BLM-administered lands, would be widened between 20 and 36 feet (depending on the jurisdiction). The scale of proposed roadways would not be inconsistent with the scale of the surrounding rural development (all County roads that are being improved will be restored to a 24-foot width after construction).
	M-5.2 Impact Mitigation for New Roadways and Improvements. Coordinate with Caltrans to mitigate negative impacts from existing, expanded, or new State freeways or highways and to reduce impacts of road improvements and/or design modifications to State facilities on adjacent communities.	**Consistent.** The applicant is required to obtain an encroachment and traffic permits from Caltrans and the County, and, as part of the permit process, will be required to ensure the safe travel of vehicles within construction work zones. All traffic impacts will be mitigated in accordance with the mitigation measures identified in the EIR/EIS.
GOAL M-6 **Efficient Freight Service Linked to Other Transportation Modes.** Freight services that efficiently move goods and that are effectively linked to other transportation modes.	**M-6.1 Designated Truck Routes.** Minimize heavy truck traffic (generally more than 33,000 pounds and mostly used for long-haul purposes) near schools and within Villages and Residential Neighborhoods by designating official truck routes, establishing incompatible weight limits on roads unintended for frequent truck traffic, and carefully locating truck-intensive land uses.	**Consistent.** Oversized construction trucks would be required to haul in turbine and other project components. Oversized trucks necessary for turbine delivery would access the project site from I-8 (via Ribbonwood Road), then head north to the proposed east/west connector road, where

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		trucks will then head east to McCain Valley Road. Schools or Villages are not located along the designated truck route for the project. Some construction vehicles are oversized trucks with up to 38 wheels and would require accompanying pilot trucks. Implementation of a traffic control plan would reduce the potential construction-related traffic impacts from the proposed project to less than significant. No long-term traffic/circulation impacts are identified.
	M-6.2 Existing Rail Line Use. Support the use of existing rail lines for freight, public transit, and tourism.	**Not Applicable.** The project would not require the use of rail lines. Turbines and associated project components are anticipated to be transported to the project site via truck.
	M-6.3 Visual Impacts on Scenic Corridors. Coordinate with railroad and transit operators to ensure that infrastructure for freight and passenger service is planned and designed to limit visual impacts on scenic corridors.	**Not Applicable.** The project does not include rail transit infrastructure.
	M-6.4 Locate Rail Facilities in Established Communities. Encourage railroad operators to use existing rights-of-way and locate stations and support facilities in established communities.	
	M-6.5 Adaptive Reuse of Abandoned Rail Lines. Support the retention of abandoned railroad rights-of way and adaptation for uses that benefit the general public, such as public transit, new road connections, regional trails and bike paths, or protected habitat areas, where appropriate.	
GOAL M-7 **Airport Facilities.** Viable and accessible airport facilities whose continuing operations effectively serve the evolving needs of the region while minimizing any adverse impacts of airport operations.	**M-7.1 Meeting Airport Needs.** Operate and improve airport facilities to meet air transportation needs in a manner that adequately considers impacts to environmental resources and surrounding communities and to ensure consistency with Airport Land Use Compatibility Plans.	**Not Applicable.** The project does not include airport facilities or operations.
GOAL M-8 **Public Transit System.** A public transit system that reduces automobile dependence and serves all segments of the population.	**M-8.1 Maximize Transit Service Opportunities.** Coordinate with SANDAG, the CTSA, NCTD, and MTS to provide capital facilities and funding, where appropriate, to: ■ Maximize opportunities for transit services in unincorporated communities Coordinate with SANDAG, the CTSA, NCTD, and MTS to provide capital facilities and funding, where appropriate, to: ■ Maximize the speed and efficiency of transit service through the development of transit priority treatments such as transit signal priority, transit queue jump lanes, and dedicated transit only lanes ■ Provide for transit-dependent segments of the population, such as the disabled, seniors, low income, and children, where possible ■ Reserve adequate rights-of-way to accommodate existing and planned transit facilities including bus stops	**Not Applicable.** As described in the EIR/EIS, there is no bus service to the general Tule Wind Project area. The only identified transportation program that may be affected by the proposed Tule Wind Project are bike routes. The project would not conflict with adopted policies, plans, or programs that support alternative transportation. The project may result in temporary impacts to the existing bike route along Old Highway 80 during the construction and decommissioning

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	M-8.2 Transit Service to Key Community Facilities and Services. Locate key County facilities, healthcare services, educational institutions, and other civic facilities so that they are accessible by transit in areas where transit is available. Require those facilities to be designed so that they are easily accessible by transit, whenever possible.	phase of the project. However, impacts would be minimal and temporary. The traffic control plan will provide for safety measures and directional guidance to deter bicyclists to a safer route along the highway during this phase.
	M-8.3 Transit Stops That Facilitate Ridership. Coordinate with SANDAG, NCTD, and MTS to locate transit stops and facilities in areas that facilitate transit ridership, and designate such locations as part of planning efforts for Town Centers, transit nodes, and large-scale commercial or residential development projects. Ensure that the planning of Town Centers and Village Cores incorporates uses that support the use of transit, including multi-family residential and mixed-use transit–oriented development, when appropriate.	
	M-8.4 Transit Amenities. Require transit stops that are accessible to pedestrians and bicyclists; and provide amenities for these users' convenience.	**Not Applicable.** Provision of transit amenities would not be feasible at the project site. As mentioned previously, there is no bus service to the general Tule Wind Project area.
	M-8.5 Improved Transit Facilities. Require development projects, when appropriate, to improve existing nearby transit and/or park and ride facilities, including the provision of bicycle and pedestrian facilities, provisions for bus transit in coordination with NCTD and MTS as appropriate including, but not limited to, shelters, benches, boarding pads, and/or trash cans, and to provide safe, convenient, and attractive pedestrian connections.	
	M-8.6 Park and Ride Facilities. Coordinate with SANDAG, Caltrans, and tribal governments to study transit connectivity and address improving regional opportunities for park-and-ride facilities and transit service to gaming facilities and surrounding rural areas to reduce congestion on rural roads.	
	M-8.7 Inter-Regional Travel Modes. Coordinate with SANDAG, Caltrans, and the California High-Speed Rail Authority, where appropriate, to identify alternative methods for inter-regional travel to serve the unincorporated County residents.	
	M-8.8 Shuttles. Coordinate with Tribal governments, the Reservation Transportation Authority, and other large employers to provide shuttles and other means of connecting transit stops with job locations, civic, and commercial uses, where appropriate.	
GOAL M-9 **Effective Use of Existing Transportation Network.** Reduce the need to widen or build roads through effective use of the existing transportation network and maximizing the use of alternative modes of travel throughout the County.	**M-9.1 Transportation Systems Management.** Explore the provision of operational improvements (i.e. adding turn lanes, acceleration lanes, intersection improvements, etc.) that increase the effective vehicular capacity of the public road network prior to increasing the number of road lanes. Ensure operational improvements do not adversely impact the transit, bicycle, and pedestrian networks.	**Consistent.** The project will create temporary, localized traffic impacts during the construction phase of the project, but no long-term traffic impacts will result during the operational phase. The addition of construction traffic generated by the project will not reduce the level of service on any of the area roadways to a level less than "C." Implementation of mitigation measures identified in the EIR/EIS (including preparation and implementation of a traffic control plan) would reduce the potential construction-related traffic impacts from the proposed project to less than significant. No long-term traffic/circulation impacts were identified.

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Goals & Objectives	Policies	Consistency Analysis
	M-9.2 Transportation Demand Management. Require large commercial and office development to use TDM programs to reduce single-occupant vehicle traffic generation, particularly during peak periods to maximize the capacity of existing or improved road facilities.	**Not Applicable.** The project does not include large commercial, office, or industrial development that would warrant provision of TDM programs or preferred parking development.
	M-9.3 Preferred Parking. Encourage and provide incentives for commercial, office, and industrial development to provide preferred parking for carpools, vanpools, electric vehicles and flex cars. [Refer also to Policy COS-16.3 (Low-Emission Vehicles) in the Conservation and Open Space Element.] Encourage parking cash out programs to reimburse employees for the cost of "free" on-site parking to provide incentives to use alternate modes of travel and to reduce parking requirements (see also Policy M-10.5).	
	M-9.4 Park-and-Ride Facilities. Require developers of large projects to provide, or to contribute to, park-and-ride facilities near freeway interchanges and other appropriate locations that provide convenient access to congested regional arterials. Require park-and-ride facilities that are accessible to pedestrians and bicyclists, and include bicycle lockers and transit stops whenever feasible.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
GOAL M-10 **Parking for Community Needs.** Parking regulations that serve community needs and enhance community character.	**M-10.1 Parking Capacity.** Require new development to: ■ Provide sufficient parking capacity for motor vehicles consistent with the project's location, use, and intensity ■ Provide parking facilities for motorcycles and bicycles ■ Provide staging areas for regional and community trails	**Consistent.** A 10-acre temporary parking lot (on BLM land) is proposed to be utilized throughout construction and will be revegetated to its natural state after construction. The parking area for the O&M building will be small and for operations personnel, and not utilized by the general public. The amount of parking would be sufficient for the project's use and location. The project area is not conducive to pedestrian activity or located within a Village or Rural Village.
	M-10.2 Parking for Pedestrian Activity. Require the design and placement of on-site automobile, motorcycle, and bicycle parking in Villages and Rural Villages that encourages pedestrian activity by providing a clear separation between vehicle and pedestrian areas and prohibit parking areas from restricting pedestrian circulation patterns.	
	M-10.3 Maximize On-street Parking. Encourage the use of on-street parking in commercial and/or high-density residential town center areas to calm traffic and improve pedestrian interaction. Traffic operations and pedestrian safety must not be compromised.	**Not Applicable.** The applicant is not proposing commercial or residential components as part of the proposed project.
	M-10.4 Shared Parking. Support town center plans, when desired by the community, that incorporate on-street and/or shared vehicular parking facilities to reduce on-site parking requirements.	
	M-10.5 Reduced Parking. Accommodate appropriate reductions in on-site parking requirements in situations such as: ■ Development of low-income and senior housing ■ Development located near transit nodes ■ Employment centers that institute Transportation Demand Management programs ■ Development that integrates other parking demand reductions techniques such as parking cash out, when ensured by ongoing permit conditions	**Not Applicable.** The proposed project is a utility scale renewable energy facility; and not conducive of such reduced parking strategies.
	M-10. 6 On-Street Parking. Minimize on-street vehicular parking outside Villages and Rural Villages where on-street parking is not needed, to reduce the width of paved shoulders and provide an opportunity for bicycle lanes to retain rural character in low-intensity areas. Where on-street parking occurs outside Villages and Rural Villages, require the design to be consistent with the rural character. [See applicable community plan for possible relevant policies.]	**Not Applicable.** The project site is not located near Villages or Rural Villages and therefore would not be subject to a reduction in on-street parking.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	M-10.7 Parking Area Design for Stormwater Runoff. Require that parking areas be designed to reduce pollutant discharge and stormwater runoff through site design techniques such as permeable paving, landscaped infiltration areas, and unpaved but reinforced overflow parking areas that increase infiltration. Require parking areas located within or adjacent to preserve areas to also include native landscaping and shielded lighting.	**Consistent.** The project will not use impervious surfaces for the 10-acre temporary parking area or the O&M facility parking area. From a water quality standpoint, the Storm Water Management Plan (SWMP) prepared for the project concludes that that the project would have low potential for water quality impacts to the surrounding water bodies, and will not substantially degrade water quality. The temporary parking are on BLM will be revegetated with native habitat in accordance with the Revegetaton Plan prepared for the project
GOAL M-11 **Bicycle and Pedestrian Facilities.** Bicycle and pedestrian networks and facilities that provide safe, efficient, and attractive mobility options as well as recreational opportunities for County residents.	**M-11.1 Bicycle Facility Design.** Support regional and community-scaled planning of pedestrian and bicycle networks.	**Not Applicable.** The project is not located within a village or rural village requiring alternate modes of transportation.
	M-11.2 Bicycle and Pedestrian Facilities in Development. Require development and Town Center plans in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation, such as comprehensive bicycle and pedestrian networks and facilities, including both on-street facilities as well as off-street bikeways, to safely serve the full range of intended users, along with areas for transit facilities, where appropriate and coordinated with the transit service provider.	
	M-11.3 Bicycle Facilities on Roads Designated in the Mobility Element. Maximize the provision of bicycle facilities on County Mobility Element roads in Semi-Rural and Rural Lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character.	**Consistent.** The only designated bikeway in the Boulevard area is on Old Highway 80. The applicant will implement a Traffic Control Plan during construction and decommissioning to mitigate for any potential impacts to recreational bicycle users along this roadway.
	M-11.4 Pedestrian and Bicycle Network Connectivity. Require development in Villages and Rural Villages to provide comprehensive internal pedestrian and bicycle networks that connect to existing or planned adjacent community and countywide networks.	**Not Applicable.** The project is not located within a village or rural village requiring bicycle network connectivity.
	M-11.5 Funding for Bicycle Network Improvements. Seek outside funding opportunities for bicycle and pedestrian network improvement projects, particularly those that provide safe and continuous pedestrian and bicycle routes to schools, town centers, parks, park-and-ride facilities, and major transit stop	**Not Applicable.** The Boulevard area is considered a "rural area" and would not be conducive to commuter bicycling in which to request funding for the construction of bikeways.
	M-11.6 Coordination with the County Trails Program. Coordinate the proposed bicycle and pedestrian network and facilities with the Community Trails Master Plan's proposed trails and pathways.	**Not Applicable.** According to the Boulevard Community Trails and Pathways Plan there is no proposed or existing pathway or trail corridor located along the proposed transmission line alignment or within the area where facilities are proposed on private lands. A proposed pathway and an existing trail are located along Ribbonwood Road; however, because the

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		Ribbonwood Road Pathway and Ribbonwood Trail are located along roadways, users of these facilities would be accustomed to the presence of vehicles.
	M-11.7 Bicycle and Pedestrian Facility Design. Promote pedestrian and bicycle facility standards for facility design that are tailored to a variety of urban and rural contexts according to their location within or outside a Village or Rural Village	**Not Applicable.** The project is not located within a village or rural village requiring bicycle network connectivity.
	M-11.8 Coordination with the County Trails Program. Coordinate the proposed bicycle and pedestrian network and facilities with the Community Trails Master Plan's proposed trails and pathways.	
GOAL M-12 **County Trails Program.** A safe, scenic, interconnected, and enjoyable non-motorized multi-use trail system developed, managed, and maintained according to the County Trails Program, Regional Trails Plan, and the Community Trails Master Plan.	**M-12.1 County Trails System.** Implement a County Trails Program by developing the designated trail and pathway alignments and implementing goals and policies identified in the Community Trails Master Plan.	**Not Applicable.** See response to Policy M-11.6 of the Mobility Element above. The project will be developed in accordance with the Regional Trails Plan and Community Trails Master Plan.
	M-12.2 Trail Variety. Provide and expand the variety of trail experiences that provide recreational opportunities to all residents of the unincorporated County, including urban/suburban, rural, wilderness, multi-use, staging areas, and support facilities.	
	M-12.3 Trail Planning. Encourage trail planning, acquisition, development, and management with other public agencies that have ownership or jurisdiction within or adjacent to the County.	
	M-12.4 Land Dedication for Trails. Require development projects to dedicate and improve trails or pathways where the development will occur on land planned for trail or pathway segments shown on the Regional Trails Plan or Community Trails Master Plan.	
	M-12.5 Future Trails. Explore opportunities to designate or construct future trails on County-owned lands, lands within the Multiple Species Conservation Program (MSCP), or other lands already under public ownership or proposed for public acquisition.	
	M-12.6 Trail Easements, Dedications, and Joint-Use Agreements. Promote trail opportunities by obtaining easements, dedications, license agreements, or joint-use agreements from other government agencies and public and semi-public agencies.	
	M-12.7 Funding for Trails. Seek funding opportunities for trail acquisition, implementation, maintenance and operation.	
	M-12.8 Trails on Private Lands. Maximize opportunities that are fair and reasonable to secure trail routes across private property, agricultural and grazing lands, from willing property owners.	
	M-12.9 Environmental and Agricultural Resources. Site and design specific trail segments to minimize impacts to sensitive environmental resources, ecological system and wildlife linkages and corridors, and agricultural lands. Within the MSCP preserves, conform siting and use of trails to County MSCP Plans and MSCP resource management plans.	
	M-12.10 Recreational and Educational Resources. Design trail routes that meet a public need and highlight the County's biological, recreational and educational resources, including natural, scenic, cultural, and historic resources.	

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Goals & Objectives	Policies	Consistency Analysis
Conservation and Open Space		
Biological Resources		
GOAL COS-1 **Inter-Connected Preserve System.** A regionally managed, inter-connected preserve system that embodies the regional biological diversity of San Diego County.	**COS-1.1 Coordinated Preserve System.** Identify and develop a coordinated biological preserve system that includes Pre-Approved Mitigation Areas, Biological Resource Core Areas, wildlife corridors, and linkages to allow wildlife to travel throughout their habitat ranges.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
	COS-1.2 Minimize Impacts. Prohibit private development within established preserves. Minimize impacts within established preserves when the construction of public infrastructure is unavoidable.	**Consistent.** The Tule Wind Project facilities would not be located within an established preserve.
	COS-1.3 Management. Monitor, manage, and maintain the regional preserve system facilitating the survival of native species and the preservation of healthy populations of rare, threatened, or endangered species.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant.
	COS-1.4 Collaboration with Other Jurisdictions. Collaborate with other jurisdictions and trustee agencies to achieve well-defined common resource preservation and management goals.	
	COS-1.5 Regional Funding. Collaborate with other jurisdictions and federal, state, and local agencies to identify regional, long-term funding mechanisms that achieve common resource management goals.	
	COS-1.6 Assemblage of Preserve Systems. Support the proactive assemblage of biological preserve systems to protect biological resources and to facilitate development through mitigation banking opportunities.	
	COS-1.7 Preserve System Funding. Provide adequate funding for assemblage, management, maintenance, and monitoring through coordination with other jurisdictions and agencies.	
	COS-1.8 Multiple-Resource Preservation Areas. Support the acquisition of large tracts of land that have multiple resource preservation benefits, such as biology, hydrology, cultural, aesthetics, and community character. Establish funding mechanisms to serve as an alternative when mitigation requirements would not result in the acquisition of large tracts of land.	
	COS-1.9 Invasive Species. Require new development adjacent to biological preserves to use non-invasive plants in landscaping. Encourage the removal of invasive plants within preserves.	**Consistent.** The majority of the Tule Wind Project area is characterized by undisturbed native vegetation communities with low levels of invasive or noxious plant species. Non-native grasses and forbs occur as a component of the understory in most of the vegetation communities in the study area, but these species are at low percent cover and are not generally viewed as invasive or noxious within existing vegetation communities. Areas within the Tule Wind Project study area where ground disturbance is occurring or has occurred support a higher level of and potential for invasive, non-native, and

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		noxious plant species. These areas include areas of grazing, developed areas, and along existing roadways. As part of the proposed project, a revegetation plan will be completed to restore temporarily disturbed areas to their natural state. Additionally a Noxious Weed and Invasive Species Control Plan will be developed as part of the project.
	COS-1.10 Public Involvement. Ensure an open, transparent, and inclusive decision-making process by involving the public throughout the course of planning and implementation of habitat conservation plans and resource management plans.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant.
	COS-1.11 Volunteer Preserve Monitor. Encourage the formation of volunteer preserve managers that are incorporated into each community planning group to supplement professional enforcement staff.	
GOAL COS-2 **Sustainability of the Natural Environment.** Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.	**COS-2.1 Protection, Restoration and Enhancement.** Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate.	**Consistent.** As discussed in the EIR/EIS, construction and operation of the Tule Wind Project (including components on lands within the jurisdiction of the County) would result in temporary and permanent impacts to native vegetation communities and would result in the indirect loss of sensitive wildlife species. To minimize impacts, mitigation measures including habitat compensation and re-vegetation are proposed. With implementation of applicable mitigation measures identified in the EIR/EIS, components of the Tule Wind Project within the jurisdiction of the County would be consistent with this policy. The compensatory mitigation detailed in the Conceptual Mitigation Plan for the Tule Wind Project is designed to provide for long-term suitable habitat use by the impacted species that may be subject to potential impacts resulting from the Tule Wind Project. The project is consistent with the provisions of the County's Resource Protection Ordinance and Biological Mitigation Ordinance.
	COS-2.2 Habitat Protection Through Site Design. Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.	**Consistent.** The applicant designed the project in consideration of the existing natural resources throughout the project area. Impacts to natural resources are minimized by virtue of the project

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Goals & Objectives	Policies	Consistency Analysis
		design, and no unmitigated impacts to natural resources would occur. The project is consistent with the provisions of the County's Resource Protection Ordinance and Biological Mitigation Ordinance. With the exception of the golden eagle, all impacts to sensitive biological resources would be mitigated to level less than significant. The applicant is actively engaged in finalizing the protective measures to be applied for golden eagles in collaboration with the United States Fish & Wildlife Service (USFWS). The applicant will confidentially share its golden eagle data and how the Avian and Bat Protection Plan (ABPP) protections will work within the County's jurisdiction after the Final EIR/EIS is released. As reported in Table 2 of the *Draft Biological Technical Report* for Tule Wind Project (HDR, 2010) and reiterated in the *Draft Biological Technical Memorandum*, no golden eagle nests are known to occur on or within 4,000 feet of County land parcels. The applicant proposed a phased approach to project implementation to avoid adverse impacts to golden eagles and will be coordinating with the USFWS to minimize impacts to Golden Eagles to the maximum extent. The applicant is conducting ongoing telemetry studies to ensure no significant adverse impacts will incur to the Golden Eagle and provide appropriate mitigation to protect this species. A Draft Biological Opinion (B.O.) has been issued for potential impacts to Quino checkerspot (QCB) habitat. Permanent impacts to occupied QCB habitat will be offset by 2:1 preservation and management of suitable QCB habitat. Additional mitigation measures also include, but are not limited to, a 15MPH speed limit, biological construction monitoring and fencing delineating

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Goals & Objectives	Policies	Consistency Analysis
		impact limits. The USFWS has made a determination that after implementation of the proposed mitigation measures the project is not likely to jeopardize the species. Temporary impacts to native vegetation communities would result from the construction of the transmission line and poles and permanent impacts would result from the construction of turbines, support facilities, and access roads. As discussed in the EIR/EIS, 17 vegetation communities were mapped as occurring within the project area. Implementation of mitigation would reduce temporary impacts to native vegetation communities to a less-than-significant level through avoidance and minimization during construction and the restoration of these communities after construction. Implementation of mitigation will also reduce permanent impacts to native vegetation communities to a less than significant level through avoidance and minimization during construction and the restoration of and/or compensation for these communities after construction. Although construction and operation of 7 turbines and the 3-mile segment of the 138 kV transmission line located under County of San Diego land use jurisdiction would result in impacts to the natural environment, these project components would indirectly work toward preserving the natural environment by producing and transmitting renewable energy. In addition, these components of the Tule Wind Project would help the County of San Diego accomplish its renewable energy goals
GOAL COS-3 **Protection and Enhancement of Wetlands.** Wetlands that are restored and enhanced and protected	**COS-3.1 Wetland Protection.** Require development to preserve existing natural wetland areas and associated transitional riparian and upland buffers and retain opportunities for enhancement.	**Consistent.** Policy COS-3.2 requires development to mitigate unavoidable losses of wetlands, and to protect wetlands from discharges and activities. Policies COS-3.1 and

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Goals & Objectives	Policies	Consistency Analysis
from adverse impacts.		3.2 would conflict if COS-3.1 is read as creating a complete ban on impacting existing wetlands. The Tule Wind Project will permanently impact 0.02 acre of County Resource Protection Ordinance (RPO) designated wetland. As detailed in Table 2-7 of the Conceptual Mitigation Plan for Tule Wind Project, this impact will be mitigated by establishing at least 0.02 acres of County RPO wetland, and preserving at least 0.02 acre of County RPO wetland to ensure no-net-loss of county RPO wetland. In addition, as required by RPO Condition (5)(ff), an additional 0.02 acre of County RPO wetland preservation will be provided for a total mitigation ratio of 3:1. The project will temporarily impact 0.03 acre of County RPO wetlands, which will be restored upon project completion as detailed in the Conceptual Revegetation Plan for the Tule Wind Project (Appendix A of the Conceptual Mitigation Plan for Tule Wind Project).
	COS-3.2 Minimize Impacts of Development. Require development projects to: ■ Mitigate any unavoidable losses of wetlands, including its habitat functions and values; and ■ Protect wetlands, including vernal pools, from a variety of discharges and activities, such as dredging or adding fill material, exposure to pollutants such as nutrients, hydromodification, land and vegetation clearing, and the introduction of invasive species.	**Consistent.** As discussed in the EIR/EIS, the Tule Wind Project area contains numerous ephemeral and intermittent drainages that would be considered non-wetland waters and streambeds and have the potential to be subject to the jurisdiction of the USACE, CDFG, RWQCB, and/or County. These non-wetland features include broad channels with incised banks and narrow channels with gently sloping banks. Most drainages were unvegetated with sand substrate. The applicant has conducted a wetland delineation survey to identify all minor streams and drainages in the area and has submitted permits to CDFG, USACE, and SWRCB. Although the project will not impact USACE, there will be impacts to USACE and RWQCB non-wetland waters and County of San Diego RPO wetlands. The project will permanently

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Goals & Objectives	Policies	Consistency Analysis
		impact 0.02 acres of County RPO wetland. As detailed in Table 2-7 of the Conceptual Mitigation Plan for Tule Wind Project, at least 0.02 acres of County RPO wetland will be established in addition to preserving at least 0.02 acres of County RPO wetland to ensure no-net-loss of county RPO wetland. In addition, as required by RPO Condition (5)(ff), an additional 0.02 acres of County RPO wetland preservation will be provided for a total mitigation ratio of 3:1. The project will temporarily impact 0.03 acres of County RPO wetlands which will be restored upon project completion as detailed in the Conceptual Revegetation Plan for the Tule Wind Project (Appendix A of the Conceptual Mitigation Plan for Tule Wind Project). Stormwater BMPs will also be incorporated into the project to protect any wetland areas from potential discharges from the project during construction.
Water Resources		
GOAL COS-4 **Water Management.** A balanced and regionally integrated water management approach to achieve the long-term viability of the County's water quality and supply.	**COS-4.1 Water Conservation.** Require development to reduce the waste of potable water through use of efficient technologies and conservation efforts that minimize the County's dependence on imported water and conserve groundwater resources.	**Consistent.** Proposed project components under the County's jurisdiction (7wind turbines a 3-mile segment of the 138 kV transmission line) would not require the regular application or use of water during operations. Therefore, development of the Tule Wind Project on County jurisdictional lands would be consistent with this policy.
	COS-4.2 Drought-Efficient Landscaping. Require efficient irrigation systems and in new development encourage the use of native plant species and non-invasive drought tolerant/low water use plants in landscaping.	
	COS-4.3 Stormwater Filtration. Maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces. This policy shall not apply in areas with high groundwater, where raising the water table could cause septic system failures, moisture damage to building slabs, and/or other problems.	**Consistent.** The proposed project will not have an adverse effect on reservoirs, lakes, rivers, groundwater, or streams. A SWMP was prepared for the project to identify site design, source control, and treatment best management practices (BMPs) to improve surface water quality to the maximum extent practicable. Appropriate BMPs will be implemented to reduce impacts to receiving waters.
	COS-4.4 Groundwater Contamination. Require land uses with a high potential to contaminate groundwater to take appropriate measures to protect water supply sources.	**Consistent.** See response to Policy COS-4.3 of the Conservation and Open Space Element above. The project construction water needs will

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Goals & Objectives	Policies	Consistency Analysis
		be adequately supplied by three existing wells on Rough Acres Ranch. The *Groundwater Investigation Report* provides an analysis of cumulative groundwater extraction operations throughout the area and concludes the project will not exceed the short-or long-term groundwater resources of the area; the project will not significantly adversely affect flora, fauna, springs, streams or nearby water rights of property owners; aquifers underlying the project site will be capable of supplying the water required; and groundwater quality will not be significantly degraded by surface or subsurface discharge of wastewater.
	COS-4.5 Recycled Water. Promote the use of recycled water and gray water systems where feasible.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant. Reclaimed water is not available in the project area, nor is it proposed as part of the project.
GOAL COS-5 Protection and Maintenance of Water Resources. Protection and maintenance of local reservoirs, watersheds, aquifer-recharge areas, and natural drainage systems to maintain high-quality water resources.	**COS-5.1 Impact to Floodways and Floodplains.** Restrict development in floodways and floodplains in accordance with policies in the Flood Hazards section of the Safety Element.	**Consistent**. See responses to the policies in the Flood Hazards section of the Safety Element.
	COS-5.2 Impervious Surfaces. Require development to minimize the use of directly connected impervious surfaces and to retain stormwater run-off caused from the development footprint at or near the site of generation.	**Consistent.** Concrete foundations for turbines 138 kV transmission line structures would alter existing drainage patterns by adding impervious surface areas. However, as discussed in the EIR/EIS, due to overall small impervious surface area created by the proposed project, the existing drainage patterns would not be adversely affected. Proposed project improvements will aim to mimic existing drainage patterns and will minimize redirection of any flows. A SWMP was prepared and recommended BMPs will be implemented to reduce potential for water degradation or erosion impacts. Implementation of mitigation measures identified in the EIR/EIS would prevent the significant alteration of existing drainage patterns or the increase of erosion or siltation.
	COS-5.3 Downslope Protection. Require development to be appropriately sited and to incorporate measures to retain natural flow regimes, thereby protecting downslope areas from erosion, capturing runoff to adequately allow for filtration and/or infiltration, and protecting downstream biological resources.	**Consistent.** As discussed in the EIR/EIS and the SWMP, the incorporation of mitigation measures into the project design will ensure that existing drainage patterns are not significantly altered

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Goals & Objectives	Policies	Consistency Analysis
		such that occurrences of erosion or siltation would substantially increase.
	COS-5.4 Invasive Species. Encourage the removal of invasive species to restore natural drainage systems, habitats, and natural hydrologic regimes of watercourses.	**Consistent.** See response to Policy COS-1.9 of the Conservation and Open Space Element above.
	COS-5.5 Impacts of Development to Water Quality. Require development projects to avoid impacts to the water quality in local reservoirs, groundwater resources, and recharge areas, watersheds, and other local water sources.	**Consistent.** The proposed project will not have an adverse effect on reservoirs, lakes, rivers, groundwater, or watersheds. A SWMP was prepared for the project to identify site design, source control, and treatment BMPs to improve surface water quality to the maximum extent practicable. Appropriate BMPs will be implemented to reduce impacts to receiving waters. The proposed project will not have an adverse effect on groundwater supplies. A groundwater investigation report was prepared in accordance with the County of San Diego Groundwater Ordinance and the *Guidelines for Determining Significance and Report Format and Content Requirements for Groundwater Resources*. The *Revised Groundwater Investigation Report* indicates that there are viable groundwater resources to meet the project demand of 58 acre feet over the nine-month project construction period, and no significant impacts to off site groundwater users were identified. Based on the results of the aquifer tests, and associated analyses, no significant impacts to this groundwater resource are anticipated associated with pumping at the tested Ewiiaapaayp Reservation or Rough Acres Ranch wells. Results of the groundwater investigation indicate that combined groundwater from the tested wells could provide a peak volume of up to 136 gpm, exceeding the project total demand of 58 acre-feet of groundwater.
Agricultural Resources		
GOAL COS-6 **Sustainable Agricultural Industry.** A viable and long-term agricultural	**COS-6.1 Economic Diversity.** Support the economic competitiveness of agriculture and encourage the diversification of potential sources of farm income, including value added products, agricultural tourism, roadside stands, organic farming, and farmers markets.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
	COS-6.2 Protection of Agricultural Operations. Protect existing agricultural operations from	**Consistent.** One parcel located within the project

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Goals & Objectives	Policies	Consistency Analysis
industry and sustainable agricultural land uses in the County of San Diego that serve as a beneficial resource and contributor to the County's rural character and open space network.	encroachment of incompatible land uses by doing the following: ■ Limiting the ability of new development to take actions to limit existing agricultural uses by informing and educating new projects as to the potential impacts from agricultural operations ■ Encouraging new or expanded agricultural land uses to provide a buffer of non-intensive agriculture or other appropriate uses (e.g., landscape screening) between intensive uses and adjacent non-agricultural land uses ■ Allowing for agricultural uses in agricultural areas and designing development and lots in a manner that facilitates continued agricultural use within the development. ■ Requiring development to minimize potential conflicts with adjacent agricultural operations through the incorporation of adequate buffers, setbacks, and project design measures to protect surrounding agriculture ■ Supporting local and State right-to-farm regulations ■ Retain or facilitate large and contiguous agricultural operations by consolidation of development during the subdivision process	area previously had an Agricultural Preserve designator (AP-30). This designation was removed as part of a rezone (04-026) and administrative permit (04-003) in April 2006, reducing 1,722 acres of a larger 14,000-acre agricultural preserve. No Williamson Act contracts are active for any of the project area parcels. Additionally, the proposed project is a permitted use in the A72 Zone subject to approval of a Major Use Permit. The proposed project is a use supportive of agriculture and compatible with agricultural uses in the area. The EIR/EIS concludes that no significant impacts to existing or future agricultural operations would occur as a result of project implementation; thus mitigation measures are not required.
	COS-6.3 Compatibility with Recreation and Open Space. Encourage siting recreational and open space uses and multi-use trails that are compatible with agriculture adjacent to the agricultural lands when planning for development adjacent to agricultural land uses.	**Consistent.** The Tule Wind Project is not proposed on any agricultural preserves or open space easements. Additionally, there are no County recreational areas or trails adjacent to or surrounding Tule Wind Project turbines located on County of San Diego jurisdictional land and the nearest residence would be located within approximately 2,000 feet of proposed turbine R-2. Project components located on lands within the land use jurisdiction of the County of San Diego have been sited to avoid impacts to natural resources by virtue of the project design, and no unmitigated impacts to natural resources would occur.
	COS-6.4 Conservation Easements. Support the acquisition or voluntary dedication of agriculture conservation easements and programs that preserve agricultural lands.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
	COS-6.5 Best Management Practices. Encourage best management practices in agriculture and animal operations to protect watersheds, reduce GHG emissions, conserve energy and water, and utilize alternative energy sources, including wind and solar power.	**Consistent.** Agriculture and animal operations are not proposed as part of the project. However, BMPs and mitigation measures will be implemented to o protect watersheds, reduce GHG emissions, and conserve energy and water, and protect the natural environment to the maximum extent.

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Goals & Objectives	Policies	Consistency Analysis
Cultural Resources		
GOAL COS-7 **Protection and Preservation of Archaeological Resources.** Protection and preservation of the County's important archeological resources for their cultural importance to local communities, as well as their research and educational potential.	**COS-7.1 Archaeological Protection.** Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources.	**Consistent.** As discussed in the EIR/EIS, mitigation measures would be implemented by the applicant to minimize potential impacts to archaeological resources. Applicable mitigation includes (but is not limited to) development and implementation of a Cultural Resources Treatment Program (avoidance of significant resources), construction monitoring, and testing and data recovery. With implementation of applicable mitigation measures, development of project components located on County jurisdiction lands would be consistent with this policy.
	COS-7.2 Open Space Easements. Require development to avoid archeological resources whenever possible. If complete avoidance is not possible, require development to fully mitigate impacts to archaeological resources.	**Consistent.** As part of the project design, cultural resources have been avoided to the greatest extent possible. One cultural site SDI-4788 was identified that could not be avoided in the project design. This site has been tested and determined to not have significant cultural significance. Ongoing monitoring for cultural resources will be conducted throughout project construction.
	COS-7.3 Archaeological Collections. Require the appropriate treatment and preservation of archaeological collections in a culturally appropriate manner.	**Consistent.** Cultural surveys have been conducted for the project area. A Class II and Class III cultural report has been completed with cultural resources mapped; for inclusion into the EIR/EIS. Cultural resources have been avoided to the greatest extent possible and no known significant County historical sites have been identified. Mitigation measures include provisions that would ensure that archaeological resources encountered during construction are treated and preserved in a culturally appropriate manner.
	COS-7.4 Consultation with Affected Communities. Require consultation with affected communities, including local tribes to determine the appropriate treatment of cultural resources.	**Consistent.** The BLM as the lead agency has initiated consultation with the SHPO on the agency's eligibility determinations. As part of the 106 process BLM and the applicant consulted with Indian tribes regarding places they attach

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Goals & Objectives	Policies	Consistency Analysis
		religious or cultural significance to ascertain the status of the places relative to National Historic Preservation Act (NHPA) eligibility. A Memorandum of Agreement was developed, which includes among other things a Treatment Plan and Discovery Plan. Consultation with the local tribes has been ongoing. The applicant is working with the tribes to ensure archaeological resources encountered during construction are treated and preserved in a culturally appropriate manner.
	COS-7.5 Treatment of Human Remains. Require human remains be treated with the utmost dignity and respect and that the disposition and handling of human remains will be done in consultation with the Most Likely Descendant (MLD) and under the requirements of Federal, State and County Regulations.	**Consistent.** As discussed in the EIR/EIS, results of a supplemental Class III intensive archaeological survey in support of the Tule Wind Project (ASM Affiliates, Inc. 2011), and assessment of proposed refinements to the project's direct and indirect impact areas have determined that no known cemeteries exist and no recorded Native American or other human remains have been found within or adjacent to the project area. The resulting potential for the inadvertent discovery of Native American or other human remains during subsurface construction is considered low. However, any adverse effect to human remains would be adverse; therefore, mitigation has been provided in the remote likelihood that unknown human remains are encountered during construction. Under CEQA, these remote impacts would be significant but can be mitigated to a level that is considered less than significant through implementation of mitigation measures identified in the EIR/EIS.
	COS-7.6 Cultural Resource Data Management. Coordinate with public agencies, tribes, and institutions in order to build and maintain a central database that includes a notation whether collections from each site are being curated, and if so, where, along with the nature and location of cultural resources throughout the County of San Diego.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
GOAL COS-8 **Protection and Conservation of the Historical Built Environment.** Protection, conservation, use, and enjoyment of the County's important historic resources.	**COS-8.1 Preservation and Adaptive Reuse.** Encourage the preservation and/or adaptive reuse of historic sites, structures, and landscapes as a means of protecting important historic resources as part of the discretionary application process, and encourage the preservation of historic structures identified during the ministerial application process.	**Consistent.** The project is proposed on undeveloped land in the McCain Valley and does not have existing historical structures on site.
	COS-8.2 Education and Interpretation. Encourage and promote the development of educational and interpretive programs that focus on the rich multicultural heritage of the County of San Diego.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
Paleontological Resources and Unique Geologic Features		
GOAL COS-9 **Educational and Scientific Uses.** Paleontological resources and unique geologic features conserved for educational and/or scientific purposes.	**COS-9.1 Preservation.** Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes.	**Consistent.** As discussed in the EIR/EIS, implementation of mitigation measures would reduce any potential impacts to paleontological resources to a level less than significant through monitoring and data recovery.
	COS-9.2 Impacts of Development. Require development to minimize impacts to unique geological features from human related destruction, damage, or loss.	**Consistent**. As discussed in Section D.7, Cultural Resources of the EIR/EIS, the Tule Wind project area is listed as Class 1, low sensitivity, and Class 2, moderate sensitivity, for paleontological resources. In addition, the County has identified the project area as possessing a "low" rating of possessing paleontological resources. No unique geologic features were found on site to date (70% surveyed), and thus, there is a low likelihood of identifying any unique paleontological or unique geologic features in the project area. The possibility of impacting unique geological features and paleontological resources is remote and the implementation of mitigation measures identified in the EIR/EIS will ensure that potential impacts would be less than significant.
Mineral Resources		
GOAL COS-10 **Protection of Mineral Resources.** The long-term production of mineral materials adequate to meet the local County average annual demand, while maintaining permitted reserves equivalent to a 50-year supply, using operational techniques and site reclamation methods consistent with	**COS-10.1 Siting of Development.** Encourage the conservation (i.e., protection from incompatible land uses) of areas designated as having substantial potential for mineral extraction. Discourage development that would substantially preclude the future development of mining facilities in these areas. Design development or uses to minimize the potential conflict with existing or potential future mining facilities. For purposes of this policy, incompatible land uses are defined by SMARA Section 3675.	**Consistent.** The Tule Wind Project area has not been classified for mineral resources by the California Geological Survey, and, therefore, has not been assigned a mineral resource zone (MRZ) classification. As discussed in the EIR/EIS, development of the Tule Wind Project would not interfere with the active mines or cause a loss of mineral resources. Therefore, development of the impacts to mineral resources would not be adverse
	COS-10.2 Protection of State-Classified or Designated Lands. Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
SMARA standards such that adverse effects on surrounding land uses, public health, and the environment are minimized.	from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.	and development of project components under County jurisdiction would be consistent with these policies.
	COS-10.3 Road Access. Prohibit development from restricting road access to existing mining facilities, areas classified MRZ-2 or MRZ-3 by the State Geologist, or areas identified in the County Zoning Ordinance for potential extractive use in accordance with SMARA section 2764.a	
	COS-10.4 Compatible Land Uses. Discourage the development of land uses that are not compatible with the retention of mining or recreational access to non-aggregate mineral deposits. *See Policy COS-10.1 for a definition of incompatible land uses.*	
	COS-10.5 Reclamation Plans. Require all mining projects to be conducted in accordance with a reclamation plan that meets the minimum reclamation standards required by the California *Surface Mining and Reclamation Act* and the associated State Mining and Geology Board regulations. Require the reclamation plan to include a phasing plan that provides for the completion of the surface mining on each segment of the mined lands so that the reclamation can be initiated at the earliest possible time on those portions of the mined lands that will not be subject to further disturbance by the surface mining operation.	**Not Applicable.** The components of the proposed project would not include mineral extraction or mining activities and thus, would not require the implementation of a reclamation plan.
	COS-10.6 Conservation of Construction Aggregate. Encourage the continued operation of existing mining facilities and streamline the permitting of new mining facilities consistent with the goal to establish permitted aggregate resources that are sufficient to satisfy 50 years of County demand.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant.
	COS-10.7 Recycling of Debris. Encourage the installation and operation of construction and demolition (C&D) debris recycling facilities as an accessory use at permitted (or otherwise authorized) mining facilities to increase the supply of available mineral resources.	
	COS-10.8 New Mining Facilities. Develop specific permit types and procedures for the authorization of new mining facilities that recognize the inherent physical effects of mining operations and the public necessity for available mineral resources adequate to meet local demand, in accordance with PRC Section 2762.	
	COS-10.9 Overlay Zones. Provide zoning overlays for MRZ-2 designated lands and a 1,500-foot-wide buffer area adjacent to such lands. Within these overlay zones, the potential effects of proposed land use actions on potential future extraction of mineral resources shall be considered by the decision makers.	
Visual Resources		
GOAL COS-11 Preservation of Scenic Resources. Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized.	**COS-11.1 Protection of Scenic Resources.** Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.	**Consistent.** The Tule Wind Project is designed to minimize visual impacts, protect scenic resources, and will not interfere with the connection of regionally significant natural features, designated historic landmarks, and points of regional historic, visual, and cultural interest, and will actually improve roadways in the project area Furthermore, no state designated scenic highways have been identified within the project area. According to the Table COS-1 of the
	COS-11.2 Scenic Resource Connections. Promote the connection of regionally significant natural features, designated historic landmarks, and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and regional trails.	

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Goals & Objectives	Policies	Consistency Analysis
		Conservation and Open Space Element of the General Plan, Interstate 8 from the El Cajon city limits to the Imperial County line and Old Highway 80 from State Route 79 (Pine Valley) to Interstate 8 (Jacumba) are included within the County Scenic Highway System. The project would not have any wind turbines within the County jurisdictional lands that could be viewed from one of these scenic highways as designated by the General Plan. The Generation tie line can be viewed from these scenic highways, but the scenic quality of these views has been disturbed by the approval and implementation of the 500kV Sunrise Powerlink transmission line that is the dominant feature within the viewshed of these highways. Therefore, the smaller gen-tie line would not detract from the quality of these resources. Components of the Tule Wind Project under the County's jurisdiction would generally avoid regionally significant or recognized landscapes. Turbines are not proposed on prominent ridgelines within County jurisdiction and natural resources will be protected and preserved to the maximum extent. Although wind turbines R-1 and R-2 (wind turbines under the County's jurisdiction) would be visible to motorists travelling on I-8 and Old Highway 80, these two turbines would be approximately five miles from I-8. Due to the distance from I-8, the visibility of wind turbines under the County's jurisdiction would not generate strong visual contrast. Portions of the he 138 kV transmission line would cross I-8 and would cross and be located adjacent to Old Highway 80 from McCain Valley Road to the rebuilt Boulevard Substation. Scenic highway impacts attributed to the 138 kV transmission line could be minimized to a level less than significant with the implementation of

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		mitigation measures identified in the EIR/EIS. While impacts may be identified as significant and unavoidable in the Final EIR/EIS, mitigation measures would be implemented by the applicant to minimize visual impacts to the extent feasible.
	COS-11.3 Development Siting and Design. Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following: ■ Creative site planning ■ Integration of natural features into the project ■ Appropriate scale, materials, and design to complement the surrounding natural landscape ■ Minimal disturbance of topography ■ Clustering of development so as to preserve a balance of open space vistas, natural features, and community character. ■ Creation of contiguous open space networks	**Consistent.** The applicant will minimize visual impacts associated with the Tule Wind Project through site design. Tule Wind Project has been proactively designed in consideration of the existing natural resources throughout the project area. Impacts to natural resources are minimized by virtue of the project design, and no unmitigated impacts to natural resources would occur. The project is consistent with the provisions of the County's Resource Protection Ordinance and Biological Mitigation Ordinance. As part of the project design, additional roadways will be constructed to facilitate the construction portion of the project. These roadways have been designed to conform with the topography to the greatest extent possible and grading required to construct these roadways will be minimized. Although construction and operation of 7 turbines and the 3-mile segment of the 138 kV transmission line located under County of San Diego land use jurisdiction would result in impacts to the natural environment, these project components would indirectly work toward preserving the natural environment by producing and transmitting renewable energy and would help the County of San Diego accomplish its Sustainable Energy Goal COS-18 as established in this Conservation and Open Space Element.
	COS-11.4 Collaboration with Agencies and Jurisdictions. Coordinate with adjacent federal and State agencies, local jurisdictions, and tribal governments to protect scenic resources and corridors that extend beyond the County's land use authority, but are important to the welfare of County residents.	**Consistent.** The applicant is actively working with each of the agencies with jurisdiction over the project to comply with the regulations of each agency. The majority of the proposed project is located on BLM lands. The BLM has classified the McCain Valley area as a Class IV for visual classification, which takes into consideration

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		visual impacts due to renewable energy projects. According to this classification, the level of change to the characteristic of the landscape can be high. Given the BLM visual classification, no visual impacts located on BLM jurisdictional lands were identified; but significant impacts would remain for the County jurisdiction.
	COS-11.5 Collaboration with Private and Public Agencies. Coordinate with the California Public Utilities Commission, power companies, and other public agencies to avoid siting energy generation, transmission facilities, and other public improvements in locations that impact visually sensitive areas, whenever feasible. Require the design of public improvements within visually sensitive areas to blend into the landscape.	**Consistent.** The applicant is coordinating with SDG&E on the interconnection of the proposed project to the Rebuilt Boulevard Substation in Boulevard. The CPUC is the lead agency for the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects EIR/EIS. The applicant is working with all affected interests and parties to develop the projects with the least amount of environmental impacts.
	COS-11.6 Billboards. Prohibit new billboards and other forms of large-scale advertising and signage within scenic corridors. Encourage the removal of existing billboards and other forms of large-scale advertising and signage along State and County scenic highway corridors.	**Not Applicable.** The applicant does not propose the use of billboards or any other large-scale advertising as any part of the project, nor does the applicant propose development along officially designated scenic highways.
	COS-11.7 Underground Utilities. Require new development to place utilities underground and encourage "undergrounding" in existing development to maintain viewsheds, reduce hazards associated with hanging lines and utility poles, and to keep pace with current and future technologies.	**Consistent.** The electrical collector system is proposed to be underground. However, where site-specific considerations (such as steep canyon crossings, soil conditions not conducive to underground collector construction or to avoid wetlands or other sensitive features) require, the collector system may need to be placed aboveground. Aboveground collector lines will use wood or steel poles that are 60 to 80 feet in height; taller heights may be needed to cross washes or drainages. The138 kV transmission line is proposed adjacent to the route of the approved Sunrise Powerlink, and if constructed, the 138 kV transmission line would not be the dominant feature. If constructed, the Sunrise Powerlink would be the dominant feature. The proposed transmission line was sited adjacent to this corridor to minimize potential visual impacts and

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		facilitate efficient transmission of energy generated from the Tule Wind Project, as well as other renewable energy projects anticipated to be operational in the future. Undergrounding the line would not provide any appreciable minimization of environmental impacts. To the contrary, undergrounding would increase impacts due to increased land disturbance causing associated impacts to cultural resources, biological floral and fauna, jurisdictional waters, and possible increase in construction air impacts. Furthermore, it is apparent that this policy is geared more toward areas with "existing development" where there is delivery of utility services, not generation of utility services.
GOAL COS-12 **Preservation of Ridgelines and Hillsides**. Ridgelines and steep hillsides that are preserved for their character and scenic value.	**COS-12.1 Hillside and Ridgeline Development Density.** Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas. **COS-12.2 Development Location on Ridges.** Require development to preserve the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.	**Consistent.** Changes to the underlying land use designation are not proposed as part of this GPA. Project facilities under County land use jurisdiction would not be located on undeveloped ridgelines or on steep hillsides. The seven turbines that are proposed as part of the project would not be constructed on a ridgeline. A ridgeline is a line formed along the highest points of a mountain ridge. The turbines within the County Jurisdiction are placed on a mesa within the McCain Valley. The nearest ridgeline would be the summit and ridge of the In-Ko-Pah Mountains, which are not within the jurisdiction of the County. Therefore, silhouetting would not be an issue.
GOAL COS-13 **Dark Skies.** Preserved dark skies that contribute to rural character and are necessary for the local observatories.	**COS-13.1 Restrict Light and Glare.** Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution. **COS-13.2 Palomar and Mount Laguna.** Minimize, to the maximum extent feasible, the impact of development on the dark skies surrounding Palomar and Mount Laguna observatories to maintain dark skies which are vital to these two world-class observatories by restricting exterior light sources within the impact areas of the observatories	**Consistent.** Outdoor lighting will be restricted to the FAA lighting required on turbines, and lighting at the O&M Building. Turbines will be equipped with obstruction lighting that would operate during the nighttime.

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Goals & Objectives	Policies	Consistency Analysis
	COS-13.3 Collaboration to Retain Night Skies. Coordinate with adjacent federal and State agencies, local jurisdictions, and tribal governments to retain the quality of night skies by minimizing light pollution.	Mitigation measures will be implemented to preserve dark skies. The applicant will ensure that lighting and reflectors installed at project facilities are not visible from public viewing areas, are positioned to reduce reflected glare, and impacts on nighttime sky are minimized. The Tule Wind Project would be located primarily within Zone A as measured from the Mount Laguna Observatory. The Tule Wind Project will be compliance with lamp type and shielding requirements for Class II Lighting within Zone A which require fully shielded low pressure sodium lamp types not to exceed 4050 lumens output. Implementation of mitigation measures identified in the EIR/EIS will ensure that a) exterior light fixtures are hooded and directed downward; b) the project is consistent with the County Light Pollution Code and County Zoning Ordinance (Section 6322 and 6324); and 3) nighttime lighting at the collector substation and O&M facility would not conflict with the operation and research endeavors of local observatories. Zoning Ordinance Section 6324 would limit illumination of outdoor public recreational facilities, unless a specific recreational activity requiring the lighting is already in progress. Security lights are excepted. The proposed project will not impact Palomar and Mount Laguna Observatories; nor would the project impact the dark skies of the area. The Tule Wind Project will comply with the County of San Diego Dark Sky Ordinance (APM TULE-AES-7) for lighting at the substation and O&M Building, and due to topography and elevation, the FAA lighting would not be considered a significant impact, given these are federal requirements.
Air Quality, Climate Change, and Energy		
GOAL COS-14	**COS-14.1 Land Use Development Form.** Require that development be located and designed to reduce	**Consistent.** The proposed project is sited to

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Sustainable Land Development. Land use development techniques and patterns that reduce emissions of criteria pollutants and GHGs through minimized transportation and energy demands, while protecting public health and contributing to a more sustainable environment.	vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.	capture the high wind resources throughout the project area. Typical clustered development practices to reduce vehicular trips would not be applicable in this instance. The proposed project would not significantly impact the existing character of the project area; and no unmitigated impact to community character has been identified (see response to Policy LU-2.4 of the Land Use Element above).
	COS-14.2 Villages and Rural Villages. Incorporate a mixture of uses within Villages and Rural Villages that encourage people to walk, bicycle, or use public transit to reduce air pollution and GHG emissions.	**Not Applicable.** The proposed project is located in an undeveloped area and not within a Village or Rural Village setting.
	COS-14.3 Sustainable Development. Require design of residential subdivisions and nonresidential development through "green" and sustainable land development practices to conserve energy, water, open space, and natural resources.	**Consistent.** The Tule Wind Project has been proactively designed in consideration of the existing natural resources throughout the project area. Impacts to natural resources are minimized by virtue of the project design, and no unmitigated impacts to natural resources would occur. Although construction and operation of 7 turbines and the 3-mile segment of the 138 kV transmission line located under County of San Diego land use jurisdiction would result in impacts to the natural environment, these project components would indirectly work toward preserving the natural environment by producing and transmitting renewable energy. These components of the Tule Wind Project would help the County of San Diego accomplish its Sustainable Energy Goal COS-18 as established in this Conservation and Open Space Element. Full project build out will help meet federal, as well as state, renewable energy policy goals, reduce fossil fuel use, curb climate change, and reduce water use by offsetting need for conventional fossil fuel-fired generation plants being built to meet future demand.
	COS-14.4 Sustainable Technology and Projects. Require technologies and projects that contribute to the conservation of resources in a sustainable manner, that are compatible with community character, and that increase the self-sufficiency of individual communities, residents, and businesses.	
	COS-14.5 Building Siting and Orientation in Subdivisions. Require that buildings be located and oriented in new subdivisions and multi-structure non-residential projects to maximize passive solar heating during cool seasons, minimize heat gains during hot periods, enhance natural ventilation, and	**Not Applicable.** Passive solar orientation of proposed facilities is not proposed as part of the Tule Wind Project.

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Goals & Objectives	Policies	Consistency Analysis
	promote the effective use of daylight.	
	COS-14.6 Solar Access for Infill Development. Require that property setbacks and building massing of new construction located within existing developed areas maintain an envelope that maximizes solar access to the extent feasible.	**Not Applicable.** The project is proposed on undeveloped land in the McCain Valley area and therefore would be considered infill development.
	COS-14.7 Alternative Energy Sources for Development Projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.	**Consistent.** The proposed project is a wind energy generation project that would provide up to 201 megawatts (MW) of clean, renewable wind energy.
	COS-14.8 Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.	**Consistent.** The proposed project would indirectly work toward preserving the natural environment by producing and transmitting renewable energy to the energy grid. In addition, the Tule Wind Project would help the County of San Diego accomplish its Sustainable Energy Goal COS-18 as established in this Conservation and Open Space Element. Full project build out will help meet federal, as well as state, renewable energy policy goals, reduce fossil fuel use, curb climate change, and reduce water use by offsetting need for conventional fossil fuel-fired generation plants being built to meet future demand.
	COS-14.9 Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.	
	COS-14.10 Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.	**Consistent.** In accordance with mitigation measures identified in the EIR/EIS, the applicant will utilize Tier 2 equipment on engines greater than 50 horsepower and Tier 3 equipment where feasible to reduce NO_x emissions. Air quality impacts generated by construction of Tule Wind Project components on County of San Diego jurisdictional lands would be minimized to the extent feasible, however, as discussed in the EIR/EIS, construction activities would generate exhaust emission of criteria pollutants and toxic air contaminants and impacts are considered significant and unmitigable. However, because mitigation would be implemented to reduce air quality impacts, project components of the Tule Wind Project under County jurisdiction would be consistent with this policy.
	COS-14.11 Native Vegetation. Require development to minimize the vegetation management of native	**Consistent.** See responses to Policy COS-2.1

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Goals & Objectives	Policies	Consistency Analysis
	vegetation while ensuring sufficient clearing is provided for fire control.	and Policy COS-2.2 of the Conservation and Open Space Element above. Also, as mentioned in the response to Policies S-3.1 through S-3.4 of the Safety Element above, fuel management areas (i.e., 100' clearance around turbines with fire-safe vegetation and annual fuel management) will be provided around project features.
	COS-14.12 Heat Island Effect. Require that development be located and designed to minimize the "heat island" effect as appropriate to the location and density of development, incorporating such elements as cool roofs, cool pavements, and strategically placed shade trees.	**Consistent.** The proposed project is a renewable energy project and does not propose a residential or commercial component to the proposed development; therefore, cool roofs, cool pavements, and strategically placed shade trees are not proposed as part of the project. Tule Wind Project would help the County of San Diego accomplish its Sustainable Energy Goal COS-18 as established in this Conservation and Open Space Element.
	COS-14.13 Incentives for Sustainable and Low GHG Development. Provide incentives such as expedited project review and entitlement processing for developers that maximize use of sustainable and low GHG land development practices in exceedance of State and local standards.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
GOAL COS-15 Sustainable Architecture and Buildings. Building design and construction techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment.	**COS-15.1 Design and Construction of New Buildings.** Require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants.	**Not Applicable.** The only building proposed as part of the project is the O&M Building. The O&M Building will be an approximate 5,000 square foot pre-engineered one-story metal building located and surrounded by a fenced and cleared area. The O&M building will include a foundation, with electrical and heating, ventilation, and air conditioning (HVAC) systems. See response COS-14.12 above.
	COS-15.2 Upgrade of Existing Buildings. Promote and, as appropriate, develop standards for the retrofit of existing buildings to incorporate design elements, heating and cooling, water, energy, and other elements that improve their environmental sustainability and reduce GHG.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant.
	COS-15.3 Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies.	
	COS-15.4 Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.	**Consistent.** The proposed project will be developed in accordance with all applicable building codes and regulations applicable to the jurisdiction in which facilities are proposed.

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Goals & Objectives	Policies	Consistency Analysis
	COS-15.5 Energy Efficiency Audits. Encourage energy conservation and efficiency in existing development through energy efficiency audits and adoption of energy saving measures resulting from the audits.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
	COS-15.6 Design and Construction Methods. Require development design and construction methods to minimize impacts to air quality.	**Consistent.** See response to Policy COS-14.10 of the Conservation and Open Space Element above. Due to the type of proposed project being a renewable energy facility, operational impacts to air quality would not occur.
GOAL COS-16 **Sustainable Mobility.** Transportation and mobility systems that contribute to environmental and human sustainability and minimize GHG and other air pollutant emissions.	**COS-16.1 Alternative Transportation Modes.** Work with SANDAG and local transportation agencies to expand opportunities for transit use. Support the development of alternative transportation modes, as provided by Mobility Element policies.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant.
	COS-16.2 Single-Occupancy Vehicles. Support transportation management programs that reduce the use of single-occupancy vehicles.	
	COS-16.3 Low-Emissions Vehicles and Equipment. Require County operations and encourage private development to provide incentives (such as priority parking) for the use of low- and zero-emission vehicles and equipment to improve air quality and reduce GHG emissions. [Refer also to Policy M- 9.3 (Preferred Parking) in the Mobility Element.]	
	COS-16.4 Alternative Fuel Sources. Explore the potential of developing alternative fuel stations at maintenance yards and other County facilities for the municipal fleet and general public.	
	COS-16.5 Transit-Center Development. Encourage compact development patterns along major transit routes.	
GOAL COS-17 **Sustainable Solid Waste Management.** Perform solid waste management in a manner that protects natural resources from pollutants while providing sufficient, long term capacity through vigorous reduction, reuse, recycling, and composting programs.	**COS-17.1 Reduction of Solid Waste Materials.** Reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated. Divert solid waste from landfills in compliance with State law.	**Consistent.** The EIR/EIS concludes that implementation of the proposed project would not result in significant impacts to landfills or solid waste management providers. Waste generated during construction would primarily consist of concrete and scrap metal from turbine pad construction, and wood from concrete pad construction. Additional waste consistent with general construction activities would also be generated. Steel scrap and wood waste would be recycled where feasible. Concrete waste would be used as on-site fill or at another site; if concrete waste cannot be reused, then it would be removed to a licensed landfill. Construction wastes are not anticipated to substantially affect the remaining capacities of local landfills. Construction wastes could be dispersed among the four landfills nearest to the project area, and
	COS-17.2 Construction and Demolition Waste. Require recycling, reduction and reuse of construction and demolition debris.	

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Goals & Objectives	Policies	Consistency Analysis
		each landfill has sufficient remaining capacity such that, in addition to the Tule Wind Project, they would be able to meet existing solid waste demands. For portions of the project within the County's jurisdiction, the project will be developed in accordance with the County of San Diego's Construction and Demolition Debris Ordinance to ensure that debris from construction is diverted away from landfills to an appropriate recycling facility.
	COS-17.3 Landfill Waste Management. Require landfills to use waste management and disposal techniques and practices to meet all applicable environmental standards.	**Not Applicable.** The proposed project is a renewable energy project; project components are not inclusive of landfill operations.
	COS-17.4 Composting. Encourage composting throughout the County and minimize the amount of organic materials disposed at landfills.	**Not Applicable.** The proposed project does not include uses that would be conducive to composting of organic materials.
	COS-17-5 Methane Recapture. Promote efficient methods for methane recapture in landfills and the use of composting facilities and anaerobic digesters and other sustainable strategies to reduce the release of GHG emissions from waste disposal or management sites and to generate additional energy such as electricity.	**Consistent.** Although not a solid waste-to-energy facility, the proposed project is a renewable energy facility that would generate and transmit electricity from the project site.
	COS-17.6 Recycling Containers. Require that all new land development projects include space for recycling containers.	**Consistent.** Recycling containers will be provided throughout construction and operation of the proposed project.
	COS-17.7 Material Recovery Program. Improve the County's rate of recycling by expanding solid waste recycling programs for residential and non-residential uses.	**Consistent.** See response to Policies COS-17.1 and COS-17.2 of the Conservation and Open Space Element above.
	COS-17.8 Education. Continue programs to educate industry and the public regarding the need and methods for waste reduction, recycling, and reuse.	**Consistent.** The applicant will provide training to construction and operations staff to maximize recycling efforts where feasible.
GOAL COS 18 **Sustainable Energy.** Energy systems that reduce consumption of non-renewable resources and reduce GHG and other air pollutant emissions while minimizing impacts to natural resources and communities.	**COS-18.1 Alternate Energy Systems Design.** Work with San Diego Gas and Electric and non-utility developers to facilitate the development of alternative energy systems that are located and designed to maintain the character of their setting.	**Consistent.** The applicant is working with SDG&E for interconnection of the Tule Wind Project to the Rebuilt Boulevard Substation. The project will generate and transmit up to 200 MW of clean renewable energy to approximately 60,000 residences per year. The project is located and designed to maintain the character of the surrounding area (See response to Policy COS-11.3 of the Conservation and Open Space Element above).
	COS-18.2 Energy Generation from Waste. Encourage use of methane sequestration and other sustainable strategies to produce energy and/or reduce GHG emissions from waste disposal or	**Not Applicable.** Although a renewable energy project, the Tule Wind Project does not include

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	management sites.	waste to energy facilities.
	COS-18.3 Alternate Energy Systems Impacts. Require alternative energy system operators to properly design and maintain these systems to minimize adverse impacts to the environment.	**Consistent.** See response to Policy COS-11.3 of the Conservation and Open Space Element above.
GOAL COS-19 **Sustainable Water Supply.** Conservation of limited water supply supporting all uses including urban, rural, commercial, industrial, and agricultural uses.	**COS-19.1 Sustainable Development Practices.** Require land development, building design, landscaping, and operational practices that minimize water consumption.	**Consistent.** The proposed project will not have an adverse effect on groundwater supplies throughout construction. The *Groundwater Investigation Report* indicates that there are viable groundwater resources to meet the project demand of 58 acre feet over the nine-month project construction period, and no significant impacts to off site groundwater users were identified. The O&M building would require up to 5 gallons per minute of potable water for the operational phase of the project for employee water and wastewater purposes. Native landscaping will be provided where required by the County of San Diego, and minimal water is expected to establish plant growth.
	COS-19.2 Recycled Water in New Development. Require the use of recycled water in development wherever feasible. Restrict the use of recycled water when it increases salt loading in reservoirs.	**Not Applicable.** Recycled water is not available in the project area, nor is it proposed as part of the project.
GOAL COS-20 **Governance and Administration.** Reduction of local GHG emissions contributing to climate change that meet or exceed requirements of the *Global Warming Solutions Act of 2006.*	**COS-20.1 Climate Change Action Plan.** Prepare, maintain, and implement a climate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant.
	COS-20.2 GHG Monitoring and Implementation. Establish and maintain a program to monitor GHG emissions attributable to development, transportation, infrastructure, and municipal operations and periodically review the effectiveness of and revise existing programs as necessary to achieve GHG emission reduction objectives.	
	COS-20.3 Regional Collaboration. Coordinate air quality planning efforts with federal and State agencies, SANDAG, and other jurisdictions.	
	COS-20.4 Public Education. Continue to provide materials and programs that educate and provide technical assistance to the public, development professionals, schools, and other parties regarding the importance and approaches for sustainable development and reduction of GHG emissions.	
Parks and Recreation		
GOAL COS 21 **Park and Recreational Facilities.** Park and recreation facilities that enhance the quality of life and meet the diverse active and passive	**COS-21.1 Diversity of Users and Services.** Provide parks and recreation facilities that create opportunities for a broad range of recreational experiences to serve user interests.	**Not Applicable.** The proposed project is not growth inducing; nor would the project create a long-term demand for parks or need to dedicate new parkland to the County.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately ten acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County.		There are no OHV areas located on County land requiring an OHV Plan. The portions of the project area within the jurisdiction of the County do not currently provide for recreational use, and the development of turbines on this land would not preclude recreational activity. According to the Boulevard Community Trails and Pathways Plan there is no proposed or existing pathway or trail corridor located along the proposed transmission line alignment or within the area where facilities are proposed on private lands. A proposed pathway and an existing trail are located along Ribbonwood Road; however, because the Ribbonwood Road Pathway and Ribbonwood Trail are located along roadways, users of these facilities would be accustomed to the presence of vehicles. Therefore, increased vehicle presence on Ribbonwood Road is not anticipated to significantly impact the use of the Ribbonwood Road Pathway and Ribbonwood Trail. Access to Tule Lake would be maintained for residences, and no other recreational facilities were identified as occurring within 1 mile of the project area. Temporary impacts to recreational facilities and recreationists will be mitigated in accordance with the mitigation measures identified in the EIR/EIS.
	COS-21.2 Location of Parks. Locate new local parks and recreation facilities near other community-oriented public facilities such as schools, libraries, and recreation centers where feasible, so that they may function as the "heart" of a community.	**Consistent.** See response to Policy COS-21.1 of the Conservation and Open Space Element above
	COS-21.3 Park Design. Design parks that reflect community character and identity, incorporate local natural and cultural landscapes and features, and consider the surrounding land uses and urban form and cultural and historic resources.	
	COS-21.4 Regional Parks. Require new regional parks to allow for a broad range of recreational activities and preserve special or unique natural or cultural features when present.	
	COS-21.5 Connections to Trails and Networks. Connect public parks to trails and pathways and other pedestrian or bicycle networks where feasible to provide linkages and connectivity between recreational uses.	
GOAL COS-22	**COS-22.1 Variety of Recreational Programs.** Provide and promote a variety of high quality active and	**Not Applicable.** This policy requires action by

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Park and Recreational Services. High-quality parks and recreation programs that promote the health and well-being of County residents while meeting the needs of a diverse and growing population.	passive recreation programs that meet the needs of and benefit County residents.	the County, and does not imply action by the applicant.
GOAL COS-23 **Recreational Opportunities in Preserves.** Acquisition, monitoring, and management of valuable natural and cultural resources where public recreational opportunities are compatible with the preservation of those resources.	**COS-23.1 Public Access.** Provide public access to natural and cultural (where allowed) resources through effective planning that conserves the County's native wildlife, enhances and restores a continuous network of connected natural habitat and protects water resources.	**Not Applicable.** Acquisition and management of new open space corridors is not proposed as part of the Tule Wind Project. These policies require action by the County, and do not imply action by the applicant.
	COS-23.2 Regional Coordination. Coordinate the planning, acquisition, protection, development, and management of open space among governmental agencies and private organizations to maximize opportunities to link regional open space lands.	
	COS-23.3 Public Safety Involvement. Coordinate with public safety agencies to address safety concerns when planning the acquisition and management of open space.	
GOAL COS-24 **Park and Recreation Funding.** Adequate funding for acquisition, development, maintenance, management, and operation of parks, recreation facilities, and preserves.	**COS-24.1 Park and Recreation Contributions.** Require development to provide fair-share contributions toward parks and recreation facilities and trails consistent with local, state, and federal law.	**Not Applicable.** See response to Policy COS-21.1 of the Conservation and Open Space Element above
	COS-24.2 Funding Opportunities. Maximize funding opportunities for the following: ■ The acquisition, expansion, and development of parks, recreation facilities, preserves, and trails ■ The operation, maintenance, and management of parks, recreation facilities, preserves, and trails	
Housing Element		
GOAL H-1 **Housing Development and Variety.** A housing stock comprising a variety of housing and tenancy types at a range of prices, which meets the varied needs of existing and future unincorporated County residents, who represent a full spectrum of age, income, and other demographic characteristics.	**H-1.1 Sites Inventory for RHNA.** Maintain an inventory of residential sites that can accommodate the Regional Housing Needs Allocation.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant. Additionally, the applicant is not proposing to construct residential units.
	H-1.2 Development Intensity Relative to Permitted Density. Encourage a development intensity of at least 80 percent of the maximum permitted gross density for sites designated at 15 to 30 dwelling units per acre in development projects.	
	H-1.3 Housing near Public Services. Maximize housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.	
	H-1.4 Special Needs Housing near Complementary Uses. Encourage the location of housing targeted to special needs groups, in close proximity to complementary commercial and institutional uses and services.	
	H-1.5 Senior and Affordable Housing near Shopping and Services. Provide opportunities for senior housing and affordable housing development within town centers, transit nodes, and other areas that offer access to shopping and services.	
	H-1.6 Land for All Housing Types Provided in Villages. Provide opportunities for small-lot single-family, duplex, triplex, and other multi-family building types in Villages.	
	H-1.7 Mix of Residential Development Types in Villages. Support the design of large-scale residential developments (generally greater than 200 dwelling units) in Villages that include a range of housing	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	types, lot sizes, and building sizes.	
	H-1.8 Variety of Lot Sizes in Large-Scale Residential Developments. Promote large-scale residential development in Semi-Rural that include a range of lot sizes to improve housing choice.	
	H-1.9 Affordable Housing through General Plan Amendments. Require developers to provide an affordable housing component when requesting a General Plan amendment for a large-scale residential project.	
GOAL H-2 **Neighborhoods That Respect Local Character.** Well-designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing.	**H-2.1 Development That Respects Community Character.** Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]	**Consistent.** The predominant land use character of the Mountain Empire subregion is overwhelmingly rural residential. The Tule Wind Project would introduce up to 7 wind turbines and a segment of the 138 kV transmission line to the Mountain Empire Subregion. Turbines in the R turbine string would be located approximately 4.5 miles northeast of the community of Boulevard and would be surrounded by turbines of similar size and color. The segment of the 138 kV transmission line under County land use jurisdiction would travel south from the collector substation along McCain Valley Road and west along Old Highway 80 prior to interconnecting with the Boulevard Substation, where existing electrical distribution lines are already located. The project will be incorporated into the natural landscape to the greatest extent possible so not to degrade or detract from the surrounding character. With implementation of mitigation measures identified in the EIR/EIS, the introduction of a 138 kV transmission line and support structures would not significantly alter the rural character of the lands on which these components would be located. The proposed project would not significantly impact the existing character of the project area; and no unmitigated impact to community character has been identified.
	H-2.2 Projects with Open Space Amenities in Villages. Require new multi-family projects in Villages to be well-designed and include amenities and common open space areas that enhance overall quality of life.	**Not Applicable.** See response to Policy H-1.1 of the Housing Element above.
GOAL H-3	**H-3.1 Federal Funding to Expand Affordable Housing.** Pursue funding from federal, State, and local sources to expand affordable housing opportunities within the unincorporated County.	**Not Applicable.** These policies require action by

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Housing Affordability for All Economic Segments. Affordable and suitable housing for all economic segments, with emphasis on the housing needs of lower income households and households with special needs.	**H-3.2 Equitable Share of Federal Funding.** Advocate for an equitable share of available federal and State housing funds for subsidizing affordable housing development within unincorporated County areas.	the County, and do not imply action by the applicant.
	H-3.3 Density Bonus as a Means to Develop Affordable Housing. Provide a local density bonus program to encourage the development of housing affordable to lower income households and special needs households.	
	H-3.4 Housing for Moderate-Income Families in Villages. Facilitate the production of housing for moderate income families within Villages by permitting developments that offer affordable housing to incorporate other compatible housing types within areas zoned for single-family residential development.	
	H-3.5 Incentives for Developments with Lower-Income Housing. Provide zoning and other incentives to support developments that incorporate housing for lower-income households or households with special needs.	
	H-3.6 Housing for Special Need Populations. Support programs that provide housing options for homeless individuals and families, particularly homeless farmworkers and day laborers.	
	H-3.7 Alternative Affordable Housing Options. Provide programs that support the development of alternative types of affordable housing such as farmworker housing, second dwelling units, manufactured or mobile homes, shared housing, and employee or workforce housing.	
	H-3.8 Housing Services Support. Continue to provide fair housing and tenant/landlord services to residents and property owners and managers throughout the unincorporated area pursuant to federal and State Fair Housing laws.	
GOAL H-4 **Affordable Housing Preservation.** Programs that conserve housing currently available and affordable to lower income households, and programs that prevent or reverse deterioration in areas exhibiting symptoms of physical decline.	**H-4.1 Rehabilitation and Revitalization Strategies.** Promote and support rehabilitation and revitalization strategies aimed at preserving the existing supply of affordable housing.	
	H-4.2 Redevelopment of Deteriorated Housing. Encourage and support residential redevelopment in areas characterized by deteriorated housing.	
GOAL H-5 **Constraints on Housing Development.** Promote governmental policies or regulations that do not unnecessarily constrain the development, improvement, or conservation of market rate or affordable housing.	**H-5.1 Periodic Review of Housing Regulations.** Periodically review and, if appropriate, revise development standards, regulations, and procedures to facilitate the development of housing, with priority given to low and moderate-income households and households with special needs.	
	H-5.2 Permit Processing Time. Reduce permit processing time and costs for projects with priority given to projects that produce housing for lower income households.	
	H-5.3 Fire Protection. Work with local fire agencies to improve fire protection for multi-story construction.	**Consistent.** The applicant developed a multi-agency FPP for the Tule Wind Project. The FPP was approved by the SDRFPD in November 2010 and accepted by the SDCFA in February 2011. The applicant and the SDRFPD entered into a Fire and Emergency Protection Services agreement on November 2, 2010. The applicant is currently in negotiations with the SDCFA to

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		finalize a Fire Services Agreement for provision of fire services within the County CSA-135. Upon certification of the FEIR/FEIS, and prior to the project being heard by the County Board of Supervisors, the applicant and the SDCFA will finalize negotiations on the agreement.
	H-5.4 Flexibility in Regulations. Modify regulations, as appropriate, to streamline regulatory processes, remove unnecessary obstacles to planned densities, and to provide flexibility so that development can respond to the unique characteristics of town center areas.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant.
GOAL H-6 **Delivery of Housing Services.** An institutional framework that effectively delivers housing services and programs to implement the goals, policies, and programs of this Housing Element.	**H-6.1 Coordinated Delivery of Programs.** Coordinate delivery of housing programs and services among various County departments.	
	H-6.2 Ongoing Implementation Monitoring. Monitor progress in implementing the goals and objectives adopted in this Housing Element.	
	H-6.3 Legislation That Recognizes Challenges of Unincorporated Communities. Pursue State-level housing and land use legislation that recognizes the diversity of unincorporated communities and the associated challenges faced by County governments.	
	H-6.4 Affordable Housing on Suitable County-Owned Properties. Facilitate the development of affordable housing on suitable, County-owned surplus properties.	
	H-6.5 Redevelopment Districts as a Source of Revenue for Affordable Housing. Encourage the use of redevelopment districts to provide revenue for affordable housing construction or revitalization projects, and explore opportunities to improve the County's ability to form and manage these districts.	
	H-6.6 Outreach for Affordable Housing. Promote the production and acceptance of affordable housing through educational outreach to developers, non-profit housing groups, the public, community groups, other jurisdictions, and County staff.	
Safety Element		
Hazards Mitigation, Disaster Preparedness, and Emergency Response		
GOAL S-1 **Public Safety.** Enhanced public safety and the protection of public and private property.	**S-1.1 Minimize Exposure to Hazards.** Minimize the population exposed to hazards by assigning land use designations and density allowances that reflect site specific constraints and hazards.	**Consistent.** Changes to the underlying land use designations are not proposed as part of this GPA. Throughout the planning process, there have been project design changes to avoid potential safety hazards resulting from the project. Sufficient setbacks to property lines and structures are proposed to ensure public safety is not jeopardized as a result of the proposed project. See response to Policy LU-11.9. The applicant will develop a Health and Safety Program for each applicable phase of the project (i.e., construction, operation, and decommissioning). The Plan will be developed to

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		protect both workers and the general public during all phases of the project. The program will be implemented to educate construction workers about the hazards associated with the particular project site and the safety measures that must be taken to prevent injury. The program will also include standards regarding occupational safety, safe work practices for each task, hazard training requirements for workers, and mechanisms for documentation and reporting.
	S-1.2 Public Facilities Location. Advise, and where appropriate require, new development to locate future public facilities, including new essential and sensitive facilities, with respect to the County's hazardous areas and State law.	**Consistent.** New public facilities are not proposed as part of the project nor would the project result in impacts to existing service levels of public facilities or services for existing residents and businesses. Due to the project area being prone to wildfires, the applicant developed a multi-agency FPP for the proposed project. See response to Policy LU-6.11 of the Land Use Element above.
	S-1.3 Risk Reduction Programs. Support efforts and programs that reduce the risk of natural and manmade hazards and that reduce the time for responding to these hazards	**Consistent.** See response to Policy LU-6.11 of the Land Use Element above. With implementation of mitigation measures identified in the EIR/EIS, potential natural and manmade hazards will be reduced to a level less than significant, and no adverse effects to public health and safety will occur. The applicant will adhere to all federal, state, and County risk reduction programs as part of project implementation.
	S-1.4 Multi-Jurisdictional Hazard Mitigation Plan. Review and update the County's Multi-Jurisdictional Hazard Mitigation Plan every five years.	**Not Applicable.** These policies require action by the County and do not imply action by the applicant.
	S-1.5 Post-disaster Reconstruction. Participate in the development of programs and procedures that emphasize coordination between appropriate public agencies and private entities to remove debris and promote the rapid reconstruction of the County following a disaster event and facilitate the upgrading of the built environment as expeditiously as possible.	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
GOAL S-2 Emergency Response. Effective emergency response to natural or human-induced disasters that minimizes the loss of life and damage to property, while also reducing disruptions in the delivery of vital public and private services during and following a disaster.	**S-2.1 Emergency Management System Training.** Conduct annual training sessions using adopted emergency management systems. Coordinate with other jurisdictions to execute a variety of exercises to test operational and emergency plans.	**Not Applicable.** These policies require action by the County and do not imply action by the applicant.
	S-2.2 Participation in Mutual Aid Systems. Maintain participation in local, regional, State, and national mutual aid systems to ensure that appropriate resources are available for response and recovery during and following a disaster.	
	S-2.3 Familiarity with National and State Response Plans. Ensure that all relevant and pertinent County of San Diego personnel are familiar with the National Incident Management System, the National Response Plan, the State of California Master Mutual Aid Agreement, and any other relevant response plans consistent with their position in the County's Emergency Management Plan.	
	S-2.4 Emergency and Disaster Education Programs. Sponsor and support education programs pertaining to emergency/disaster preparedness and response protocols and procedures. Distribute information about emergency preparedness to community groups, schools, religious institutions, transient occupancy establishments, and business associations.	
	S-2.5 Existing Development within 100-year Flood Zones. Implement flood warning systems and evacuation plans for areas that are already developed within 100-year flood zones.	**Not Applicable**. The project area is not located within any FEMA regulated floodplain requiring the implementation of a flood warning system and evacuation plans.
	S-2.6 Effective Emergency Evacuation Programs. Develop, implement, and maintain an effective evacuation program for areas of risk in the event of a natural disaster.	**Consistent.** Although this policy requires action by the County and does not imply action by the applicant, the proposed east/west connector road may be used by emergency responders and the public during the time of an evacuation.
Fire Hazards		
GOAL S-3 Minimized Fire Hazards. Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards.	**S-3.1 Defensible Development.** Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.	**Consistent.** The applicant developed a multi-agency FPP for the Tule Wind Project. The FPP was approved by the SDRFPD in November 2010 and accepted by the SDCFA in February 2011. The applicant and the SDRFPD entered into a Fire and Emergency Protection Services agreement on November 2, 2010. The applicant is currently in negotiations with the SDCFA to finalize a Fire Services Agreement for provision of fire services within the County CSA-135. Upon certification of the FEIR/FEIS, and prior to the project being heard by the County Board of Supervisors, the applicant and the SDCFA will finalize negotiations on the agreement. The project design features and mitigation
	S-3.2 Development in Hillsides and Canyons. Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.	
	S-3.3 Minimize Flammable Vegetation. Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas, or islands of flammable vegetation within a development.	
	S-3.4 Service Availability. Plan for development where fire and emergency services are available or planned.	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		measures proposed to minimize the potential for an ignition include: automatic fire suppression systems in the wind turbine nacelle(s), various design features such as arc flash relays; fuel management around project features (i.e., 100' clearance around turbines with fire-safe vegetation and annual fuel management); four (4) 10,000 gallon water storage tanks installed throughout the project area that can be utilized for regional fire suppression support; training of both construction and operational personnel by SDRFPD personnel, or another entity certified to conduct such training, on the proper use of Type VI firefighting equipment to fight incipient fires; and funding for both the SDCFA and the SDRFPD for training and acquisition of fire equipment and apparatus. Not only has the project applicant minimized the risk of potential ignition sources resulting from the project, but it will also improve access and response times throughout the project area, and provide water for wildland firefighting within the large expanse of BLM lands that do not currently have access or water. Implementation of APMs and mitigation measures would reduce the fire risk and probability of a wildfire to a level less than significant. The FPP requires, among other things, the implementation of additional measures and project design features at the project site to further reduce fire risk and improve the response and firefighting effectiveness throughout the project area and surrounding community. The applicant will also develop a Construction Fire Prevention and Protection Plan in accordance with mitigation measures identified in the EIR/EIS. All construction work on the project will follow the Construction Plan guidelines and commitments, and plan contents will be

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		incorporated into the standard construction contracting agreements. At a minimum, plan contents will include the requirements of Title 14 of the California Code of Regulations, Article 8 #918 "Fire Protection."
	S-3-5 Access Roads. Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.	**Consistent.** The project includes construction of new roadways which will improve fire and emergency access to the area and aide in civilian evacuation. The proposed east/west connector road may be used by emergency responders and the public during the time of an evacuation. Furthermore, the project will comply with the California Fire Code standard for road widths on lands outside the County's jurisdiction, and the Department of Public Works Private Road standard of 24 feet (28 foot graded extent).
	S-3.6 Fire Protection Measures. Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.	**Consistent.** See response to Polices S-3.1 through S-3.4 of the Safety Element above.
	S-3.7 Fire Resistant Construction. Require all new, remodeled, or rebuilt structures to meet current ignition resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting of existing structures in high fire hazards areas.	**Consistent.** The project will be constructed in accordance with all fire protection requirements and building codes. Turbines and the O&M building will include fire suppression systems to minimize potential for fire hazards resulting from the project. See response to Polices S-3.1 through S-3.4 of the Safety Element above.
GOAL S-4 **Managed Fuel Loads.** Managed fuel loads, including ornamental and combustible vegetation.	**S-4.1 Fuel Management Programs.** Support programs consistent with state law that require fuel management/modification within established defensible space boundaries and when strategic fuel modification is necessary outside of defensible space, balance fuel management needs to protect structures with the preservation of native vegetation and sensitive habitats.	**Consistent.** The Tule Wind Project will pose a less than significant fire risk after mitigation (Class II impact). Accordingly, the project would be consistent with Goal S-4 and Policy S-4.1 because it would not exacerbate an already existing hazard. Furthermore, the Tule Wind Project will not add any fuel loads to existing vegetation. In addition, the context for Goal S-4 indicates that its focus is on preparing defensible space (GPU, at C.7.7-7). As mentioned in the response to Policies S-3.1 through S-3.4 of the Safety Element above, fuel management areas (i.e., 100' clearance around turbines with fire-safe vegetation and annual fuel

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		management) will be provided around project features and the applicant will contribute to fund a SDCFA Fire Code Specialist II position and stipend fire inspectors to enforce code compliance..
	S-4.2 Coordination to Minimize Fuel Management Impacts. Consider comments from CAL FIRE, U.S. Forest Service, local fire districts, and wildlife agencies for recommendations regarding mitigation for impacts to habitat and species into fuel management projects.	**Consistent.** The applicant developed a multi-agency FPP for the Tule Wind Project. The FPP was approved by the SDRFPD in November 2010 and accepted by the SDCFA in February 2011.
	S-4.3 Forest Health. Encourage the protection of woodlands, forests, and tree resources and limit fire threat through appropriate fuel management such as removal of dead, dying, and diseased trees.	**Consistent.** The project is not located within a woodland area or forest. Fuel management will be provided for as mentioned in response to Policy S-4.2 of the Safety Element above.
GOAL S-5 **Regional Fire Protection.** Regional coordination among fire protection agencies.	**S-5.1 Regional Coordination Support.** Advocate and support regional coordination among fire protection and emergency service providers.	**Consistent.** See response to Polices S-3.1 through S-3.4 of the Safety Element above.
	S-5.2 Fire Service Provider Agreements. Encourage agreements between fire service providers to improve fire protection and to maximize service levels in a fair, efficient, and cost effective manner.	**Consistent.** The applicant and the SDRFPD entered into a Fire and Emergency Protection Services agreement on November 2, 2010. The applicant is currently in negotiations with the SDCFA to finalize a Fire Services Agreement for provision of fire services within the County CSA-135. Upon certification of the FEIR/FEIS, and prior to the project being heard by the County Board of Supervisors, the applicant and the SDCFA will finalize negotiations on the agreement.
	S-5.3 Reassessment of Fire Hazards. Coordinate with fire protection and emergency service providers to reassess fire hazards after wildfire events to adjust fire prevention and suppression needs, as necessary, commensurate for both short and long term fire prevention needs.	**Not Applicable.** This Goal requires action by the County, and does not imply action by the applicant.
GOAL S-6 **Adequate Fire and Medical Services.** Adequate levels of fire and emergency medical services (EMS) in the unincorporated County.	**S-6.1 Water Supply.** Ensure that water supply systems for development are adequate to combat structural and wildland fires.	**Consistent.** See response to Goal LU-8 and associated Policies LU-8.1 through LU-8.3 of the Land Use Element above.
	S-6.2 Fire Protection for Multi-Story Development. Coordinate with fire services providers to improve fire protection services for multi-story construction.	**Consistent.** Proposed turbines could be considered multi-story structures. Coordination has been ongoing with the fire agencies by the applicant. The applicant will install fire suppression systems in up-tower design which will be certified by a nationally-recognized third party testing agency in an effort to reduce

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		potential impacts resulting from turbine fires. See response to Polices S-3.1 through S-3.4 of the Safety Element above.
	S-6.3 Funding Fire Protection Services. Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.	**Consistent.** As part of the project mitigation, the applicant will provide funding to increase SDCFA's fire inspection capabilities. One Fire Code Specialist II position will be funded to enforce existing fire code requirements throughout the life of the project. The applicant will also provide training of both construction and operational personnel by SDRFPD personnel, or another entity certified to conduct such training, on the proper use of Type VI firefighting equipment to fight incipient fires, and provide funding for both the SDCFA and the SDRFPD for training and acquisition of fire equipment and apparatus. In addition, five water tanks will be provided by the applicant to provide water sources to fire agencies. These funding contributions are considered a contribution to the project's "fair share." See response to Polices S-3.1 through S-3.4 of the Safety Element above.
	S-6.4 Fire Protection Services for Development. Require that development demonstrate that fire services can be provided that meet the minimum travel times identified in Table S-1 (Travel Time Standards). 20 minute travel time for the following land use designations: • Limited Semi-Rural Residential areas (>SR-4, SR-10) and Rural Lands (RL- 20) >20 minute travel time for the following land use designations: • Very-low rural land densities (RL-40 and RL-80).	**Consistent.** The proposed site for the O&M building on County land is designated as Rural Land-80 (RL-80), which allows for an emergency response time of greater than 20 minutes. Preliminary calculations indicate that the emergency response time to the northern-most County boundary would be slightly less than 20 minutes. *See* SDRFPD Fire Protection Plan, Table 7, at 44 (November 3, 2010). Assuming a response-time speed of 35 mph (National Fire Prevention Association standard), fire protection agencies could respond to fires at project components under the jurisdiction of the County within the established County of San Diego Existing General Plan response-time goal

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		of 20 minutes. In addition, according to AMR San Diego, average response time within the Rural East 2 Zone service area is 18 minutes. Therefore, because fire protection agencies could respond to fires at project components within the established County response-time goal of 20 minutes, and because emergency services could be provided within the same County response time goal, the project is consistent with this policy.
	S-6.5 Concurrency of Fire Protection Services. Ensure that fire protection staffing, facilities and equipment required to serve development are operating prior to, or in conjunction with, the development. Allow incremental growth to occur until a new facility can be supported by development.	**Consistent**. The SDRFPD and the SDCFA have approved the Tule Wind FPP and concluded that the agencies will have sufficient staffing, facilities, and equipment to service the project.
Geologic Hazards		
GOAL S-7 **Reduced Seismic Hazards.** Minimized personal injury and property damage resulting from seismic hazards.	**S-7.1 Development Location.** Locate development in areas where the risk to people or resources is minimized. In accordance with the California Department of Conservation Special Publication 42, require development be located a minimum of 50 feet from active or potentially active faults, unless an alternative setback distance is approved based on geologic analysis and feasible engineering design measures adequate to demonstrate that the fault rupture hazard would be avoided.	**Consistent.** The proposed project site does not cross any mapped Alquist-Priolo Earthquake Hazard Zones nor is the project site located in special studies zones defined by the County of San Diego. Seismic hazards are not anticipated to occur to project components under County jurisdiction because faults would not cross lands underlying these components The closest active fault to the Tule Wind Project is the Coyote Mountain section of the Elsinore Fault, located approximately 7.1 miles to the northeast. One potentially active fault transects the project area near Turbines Q1 and Q2; however, these turbines would be under the jurisdiction of the BLM. Tule Wind LLC will mitigate all potential seismic related impacts associated with construction and operation of the Tule Wind Project. Geotechnical investigations will provide an evaluation of the potential for liquefaction, lateral spreading, seismic slope instability, and ground-cracking hazards to affect the approved project and all associated facilities. Where hazards are found to exist, appropriate engineering design and construction measures that meet California
	S-7.2 Engineering Measures to Reduce Risk. Require all development to include engineering measures to reduce risk in accordance with the California Building Code, Uniform Building Code, and other seismic and geologic hazard safety standards, including design and construction standards that regulate land use in areas known to have or potentially have significant seismic and/or other geologic hazards.	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		Building Code and Institute of Electrical and Electronics Engineers design parameters would be incorporated into the project design. Implementation of mitigation measures identified in the EIR/EIS would ensure that development would adhere to all applicable engineering design and construction codes that would reduce adverse effects resulting from ground shaking and liquefaction during construction and operational phases. The EIR/EIS determined the impacts associated with seismic activity to be less than significant with implementation of the identified mitigation measures.
	S-7.3 Land Use Location. Prohibit high occupancy uses, essential public facilities, and uses that permit significant amounts of hazardous materials within Alquist-Priolo and County special studies zones.	**Consistent.** The Project does not include high occupancy or "essential" facilities, nor does the project site cross any mapped Alquist-Priolo Earthquake Hazard Zones or special studies zones defined by the County of San Diego.
	S-7.4 Unreinforced Masonry Structures. Require the retrofitting of unreinforced masonry structures to minimize damage in the event of seismic or geologic hazards.	**Not Applicable.** Retrofitting existing unreinforced masonry structures or essential facilities is not proposed as part of the project.
	S-7.5 Retrofitting of Essential Facilities. Seismic retrofit essential facilities to minimize damage in the event of seismic or geologic hazards	
GOAL S-8 **Reduced Landslide, Mudslide, and Rock Fall Hazards.** Minimized personal injury and property damage	**S-8.1 Landslide Risks.** Direct development away from areas with high landslide, mudslide, or rock fall potential when engineering solutions have been determined by the County to be infeasible. **S-8.2 Risk of Slope Instability.** Prohibit development from causing or contributing to slope instability.	**Consistent.** The proposed project area has steep slopes (with some greater than 25%); however, the majority of the project area (approximately 90%) is underlain by tonalite and

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Flood Hazards		
GOAL S-9 **Protection of Life and Property.** Minimized personal injury and property damage losses resulting from flood events.	**S-9.1 Floodplain Maps.** Manage development based on federal floodplain maps. County maps shall also be referred to and in case of conflict(s) between the County floodplain maps and the federal floodplain maps, the more stringent of restrictions shall apply.	**Consistent.** The Project area is not located within any FEMA designated Special Flood Hazard Area. Firm panels 06073C1800F, 06073C1825F, 06073C2075F, and 06073C2100F collectively cover the project site and indicate the project site is Zone D, area of undetermined but possible flood hazards. The *CEQA Drainage Study* prepared for the project concludes that project impacts (from a flood impact standpoint) are determined to be negligible.
	S-9.2 Development in Floodplains. Limit development in designated floodplains to decrease the potential for property damage and loss of life from flooding and to avoid the need for engineered channels, channel improvements, and other flood control facilities. Require development to conform to federal flood proofing standards and siting criteria to prevent flow obstruction.	**Consistent.** Please see response to Policy S-9-1 of the Safety Element above. The project area is not located within an identified FEMA regulated floodplain. The project will impact some stream crossings due to roadway access, although no fill or construction is proposed in any floodway. No flood protection measures are proposed with the exception of reinforcement at grade road crossings or small portions of graded pads; therefore, no structural flood protection methods are required.
	S-9.3 Development in Flood Hazard Areas. Require development within mapped flood hazard areas be sited and designed to minimize on and off-site hazards to health, safety, and property due to flooding.	**Consistent.** Please see response to Policy S-9-1 of the Safety Element above.
	S-9.4 Development in Villages. Allow new uses and development within the floodplain fringe (land within the floodplain outside of the floodway) only when environmental impacts and hazards are mitigated. This policy does not apply to floodplains with unmapped floodways. Require land available outside the floodplain to be fully utilized before locating development within a floodplain. Development within a floodplain may be denied if it will cause significant adverse environmental impacts or is prohibited in the community plan. Channelization of floodplains is allowed within villages only when specifically addressed in community plans.	**Not Applicable.** The project area is not located within a designated County Village or within a FEMA regulated floodplain.
	S-9.5 Development in the Floodplain Fringe. Prohibit development in the floodplain fringe when located on Semi-Rural and Rural Lands to maintain the capacity of the floodplain, unless specifically allowed in a community plan. For parcels located entirely within a floodplain or without sufficient space for a building pad outside the floodplain, development is limited to a single family home on an existing lot or those uses that do not compromise the environmental attributes of the floodplain or require further channelization.	**Consistent.** Please see response to Policy S-9-1 of the Safety Element above.
	S-9.6 Development in Dam Inundation Areas. Prohibit development in dam inundation areas that may interfere with the County's emergency response and evacuation plans.	**Not Applicable.** The project area is not located within a dam inundation area.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
GOAL S-10 **Floodway and Floodplain Capacity.** Floodways and floodplains that have acceptable capacity to accommodate flood events.	**S-10.1 Land Uses within Floodways.** Limit new or expanded uses in floodways to agricultural, recreational, and other such low-intensity uses and those that do not result in any increase in flood levels during the occurrence of the base flood discharge, do not include habitable structures, and do not substantially harm, and fully offset, the environmental values of the floodway area. This policy does not apply to minor renovation projects, improvements required to remedy an existing flooding problem, legal sand or gravel mining activities, or public infrastructure.	**Not Applicable.** The project area is not located within any FEMA regulated floodplain. The project will impact some stream crossing for access purposes or small graded areas, but will not alter any floodplains or result in impacts to the overall conveyance of flows.
	S-10.2 Use of Natural Channels. Require the use of natural channels for County flood control facilities except where necessary to protect existing structures from a current flooding problem and where natural channel use is deemed infeasible. The alternative must achieve the same level of biological and other environmental protection, such as water quality, hydrology, and public safety.	**Consistent.** Proposed project improvements will aim to mimic existing drainage patterns and will minimize redirection of any flows. Improvements include graded pads, access roads, utility lines, and engineered crossings at each drainage feature. Project improvements would provide for minimal additional impervious areas. Any increase in runoff resulting from these impacts is determined to be negligible, from a flood impact standpoint. Based on this all existing natural channels will be maintained, with minimal erosion protection around access facilities and minimal graded areas. From a water quality standpoint, the SWMP prepared for the project concludes that that the project would have low potential for water quality impacts to the surrounding water bodies, and will not substantially degrade water quality.
	S-10.3 Flood Control Facilities. Require flood control facilities to be adequately sized, constructed, and maintained to operate effectively.	**Consistent.** The Project area is not located within any FEMA designated Special Flood Hazard Area. Firm panels indicate the Project site is Zone D, area of undetermined but possible flood hazards. The *CEQA Drainage Study* prepared for the project concludes that project impacts (from a flood impact standpoint) are determined to be negligible.
	S-10-4 Stormwater Management. Require development to incorporate low impact design, hydromodification management, and other measures to minimize stormwater impacts on drainage and flood control facilities.	**Consistent.** The proposed project will not have an adverse effect on reservoirs, lakes, rivers, or streams. A SWMP was prepared for the project to identify site design, source control, and treatment best management practices to improve surface water quality to the maximum extent practicable. Appropriate BMPs will be implemented to reduce impacts to receiving waters.
	S-10.5 Development Site Improvements. Require development to provide necessary on- and off-site improvements to stormwater runoff and drainage facilities.	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	S-10-6 Stormwater Hydrology. Ensure development avoids diverting drainages, increasing velocities, and altering flow rates to off-site areas to minimize adverse impacts to the area's existing hydrology.	**Consistent.** Please see response to Policy S-10.2 of the Safety Element above.
Hazardous Materials		
GOAL S-11 **Controlled Hazardous Material Exposure.** Limited human and environmental exposure to hazardous materials that pose a threat to human lives or environmental resources.	**S-11.1 Land Use Location.** Require that land uses involving the storage, transfer, or processing of hazardous materials be located and designed to minimize risk and comply with all applicable hazardous materials regulations.	**Consistent.** The use, transport, and storage of hazardous materials during construction of the project would include vehicle and equipment maintenance fuels, lubricating oils, grease, solvents, hydraulic fluid, and coolant. Industrial waste would be generated in the construction phase and would include paints and solvents associated with the assembly of the turbines and towers. The implementation of applicant proposed measures (APMs) and mitigation measures, including the development of a Health and Safety Program and a Waste Management Plan would reduce potential for risks and achieve compliance with hazardous materials regulations.
	S-11.2 Industrial Use Restrictions. Restrict industrial uses that store, process, or transport significant amounts of hazardous material to areas designated as High Impact Industrial.	**Not Applicable.** The project is a renewable energy project and is not a High Impact Industrial use. Storage, processing, or transportation of significant amounts of hazardous materials is not proposed.
	S-11.3 Hazards-Sensitive Uses. Require that land uses using hazardous materials be located and designed to ensure sensitive uses, such as schools, hospitals, day care centers, and residential neighborhoods, are protected. Similarly, avoid locating sensitive uses near established hazardous materials users or High Impact Industrial areas where incompatibilities would result.	**Consistent.** The project is not located near sensitive uses. The nearest residence is approximately 2,000 feet away from proposed turbines. Please see response to Policy S-11.1 of the Safety Element above.
	S-11.4 Contaminated Lands. Require areas of known or suspected contamination to be assessed prior to reuse. The reuse shall be in a manner that is compatible with the nature of the contamination and subsequent remediation efforts.	**Consistent.** The project area has previously been used for agricultural activities where pesticides or herbicides may have been used. The applicant will comply with mitigation measures identified in the EIR/EIS that provide for testing for residual pesticides/herbicides and implementing a contingency plan if contamination is identified.
	S-11.5 Development Adjacent to Agricultural Operations. Require development adjacent to existing agricultural operations in Semi-Rural and Rural Lands to adequately buffer agricultural areas and ensure compliance with relevant safety codes where pesticides or other hazardous materials are used.	**Consistent.** The EIR/EIS concludes that no significant impacts to existing or future agricultural operations would occur as a result of project implementation; thus mitigation measures are not required. See response to Policy S-11.4 of the Safety Element above.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Law Enforcement		
GOAL S-12 **Adequate Law Enforcement Facilities.** Timely development of law enforcement facilities in locations that serve the unincorporated areas of the County.	**S-12.1 New Law Enforcement Facilities.** Coordinate new law enforcement facilities and services with new development in ways that sustain the provision of comprehensive services at levels consistent with substantially similar areas of the County.	**Consistent.** The proposed project will not have an adverse effect on the provision of law enforcement throughout the project area or the surrounding community. Some of these policies require action by the County, and do not imply action by the applicant. However, the proposed project is not anticipated to result in increased criminal occurrences or a need for additional law enforcement.
GOAL S-13 Safe Communities. Law enforcement facilities and services that help maintain safe communities.	**S-13.1 Sheriff Facility Locations.** Locate Sheriff facilities to best serve existing and planned development and the corresponding demand for services.	
	S-13.2 Sheriff Facilities in Non-Residential Areas. Locate future Sheriff facilities in commercial, industrial, or mixed-use areas; they may also be located within residential areas when other sites are unavailable or unsuitable based on circulation, geography, proximity to demand, and other factors that impact the practical provision of services.	
GOAL S-14 **Crime Prevention.** Crime prevention through building and site design.	**S-14.1 Vehicular Access to Development.** Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.	
	S-14.2 Development Safety Techniques. Require development within Village areas to utilize planning and design techniques, as appropriate, that deter crime.	
	S-14.3 Crime Prevention. Coordinate with appropriate agencies and the community to reduce crime in all neighborhoods by improving communication and relationships with communities and through educational programs that address important safety issues.	
Airport Hazards		
GOAL S-15 **Airport Zone Hazards.** Development within airport hazard zones that minimize the risk of personal injury to both flight occupants and people and property damage on the ground as well as protect airport operations from incompatible land uses.	**S-15.1 Land Use Compatibility.** Require land uses surrounding airports to be compatible with the operation of each airport.	**Consistent.** The project is located approximately 6 miles west of the Jacumba Airport. The project area contains a private airstrip on Rough Acres Ranch (RAR). Hamann Properties, the owners of RAR has an agreement with SDG&E for the termination of fixed-wing air rights and the airport would remain non-operational.
	S-15.2 Airport Operational Plans. Require operational plans for new public/private airports and heliports, as well as future operational changes to existing airports, to be compatible with existing and planned land uses that surround the airport facility.	**Consistent.** The project is not located within the Jacumba Airport Operational Plan.
	S-15.3 Hazardous Obstructions within Airport Approach and Departure. Restrict development of potentially hazardous obstructions or other hazards to flight located within airport approach and departure areas or known flight patterns and discourage uses that may impact airport operations or do not meet Federal or State aviation standards.	**Consistent.** The project is not located in a flight hazard area and the project would not present a flight hazard for approach or departure of aircraft. FAA determinations were made in 2007 for turbines on private land. Original FAA determinations are provided as part of the MUP submittal. The applicant has made an application with the FAA to renew them. That renewal is in

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		process. The applicant is working with the FAA to obtain final No Hazard determinations.
	S-15.4 Private Airstrip and Heliport Location. Locate private airstrips and heliports outside of safety zones and flight paths for existing airports where they are compatible with surrounding established and planned land uses, and in a manner to avoid impacting public roadways and facilities.	**Not Applicable.** A private airstrip or heliport location is not proposed as part of the project.
Noise Element		
Land Use Compatibility		
GOAL N-1 **Land Use Compatibility.** A noise environment throughout the unincorporated County that is compatible with the land uses.	**N-1.1 Noise Compatibility Guidelines.** Use the Noise Compatibility Guidelines (Table N-1) and the Noise Standards (Table N-2) as a guide in determining the acceptability of exterior and interior noise for proposed land uses.	**Consistent.** The *Draft Tule Wind Project Noise Analysis Report* (July 2011) concluded that the project will not have significant noise impacts on residences and will comply with the County's noise ordinance with implementation of mitigation identified in the EIR/EIS. Additionally, the applicant is working with the County to provide noise data, analysis, and technical expertise to support the proposed project, in addition to development of the proposed wind ordinance under preparation by County staff. The proposed project is the first of its kind within lands under the jurisdiction of the County. As part of the proposed amendment to the Zoning ordinance, the applicant will provide backup noise assumptions and standards to be utilized for the project as proposed.
	N-1.2 Noise Management Strategies. Require the following strategies as higher priorities than construction of conventional noise barriers where noise abatement is necessary: • Avoid placement of noise sensitive uses within noisy areas • Increase setbacks between noise generators and noise sensitive uses • Orient buildings such that the noise sensitive portions of a project are shielded from noise sources • Use sound-attenuating architectural design and building features • Employ technologies when appropriate that reduce noise generation (i.e. alternative pavement materials on roadways)	**Consistent.** The project will comply with the County's Noise Ordinance. Strategies to mitigate adverse noise impacts to surrounding properties include turbine layout changes, selection of quieter turbines, and nighttime curtailment.
	N-1.3 Sound Walls. Discourage the use of noise walls. In areas where the use of noise walls cannot be avoided, evaluate and require where feasible, a combination of walls and earthen berms and require the use of vegetation or other visual screening methods to soften the visual appearance of the wall.	**Consistent.** The proposed project does not include noise walls. The *Draft Tule Wind Project Noise Analysis Report* (July 2011) concluded that the project will not have significant noise impacts on residences and will comply with the County's

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		Noise Ordinance with implementation of mitigation identified in the EIR/EIS.
	N-1.4 Adjacent Jurisdiction Noise Standards. Incorporate the noise standards of an adjacent jurisdiction into the evaluation of a proposed project when it has the potential to impact the noise environment of that jurisdiction.	**Consistent.** Construction and operation of the proposed project will comply with all applicable noise regulations. The noise and vibration analysis included in the *Draft Tule Wind Project Noise Analysis Report* (July 2011) concluded the project would be compliant with the San Diego County Code of Regulatory Ordinances, including the San Diego County Noise Ordinance upon implementation of mitigation measures identified in the EIR/EIS.
	N-1.5 Regional Noise Impacts. Work with local and regional transit agencies and/or other jurisdictions, as appropriate, to provide services or facilities to minimize regional traffic noise and other sources of noise in the County.	**Not Applicable.** This policy requires action by the County and does not imply action by the applicant.
GOAL N-2 **Protection of Noise Sensitive Uses.** A noise environment that minimizes exposure of noise sensitive land uses to excessive, unsafe, or otherwise disruptive noise levels.	**N-2.1 Development Impacts to Noise Sensitive Land Uses.** Require an acoustical study to identify inappropriate noise level where development may directly result in any existing or future noise sensitive land uses being subject to noise levels equal to or greater than 60 CNEL and require mitigation for sensitive uses in compliance with the noise standards listed in Table N-2.	**Consistent.**. A thorough acoustical analysis was performed for the proposed project. With implementation of the mitigation measures identified in the EIR/EIS, implementation of the proposed project will not result in any noise sensitive land use being subject to noise levels of CNEL equal to 60 decibels or greater. The information presented in the noise report was presented in Leq because the County's noise ordinance uses Leq to determine noise limits (see County Code of Regulatory Ordinances, §§ 36.402(b), 36.404) and using the Leq measurement was technically justified. However, in response to requests by County staff, further analysis was conducted to present the noise results in CNEL. Although the numbers change when the noise is presented in CNEL instead of Leq, the conclusion remains the same: with mitigation, the project will have no significant noise impacts on residences and will comply with the County's noise ordinance. The *Draft Tule Wind Project Noise Analysis Report* (July 2011) concluded that the project would be compliant with the San Diego County

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		Code of Regulatory Ordinances, including the San Diego County Noise Ordinance and noise standards listed in Table N-2 upon implementation of mitigation measures identified in the EIR/EIS. Compliance with Section 36.404 of the San Diego County Code will be achieved through the following measures that are being considered as part of final design: revising turbine layout, nighttime curtailment of select turbines, utilizing an alternate turbine manufacturer, and implementation of noise reduction technology. Upon approval of the final design and project layout, and prior to construction, the noise report will be finalized to demonstrate compliance with the San Diego County Code of Regulatory Ordinances Section 36.404.
	N-2.2 Balconies and Patios. Assure that in developments where the exterior noise level on patios or balconies for multi-family residences or mixed-use developments exceed 65 CNEL, a solid noise barrier is incorporated into the building design of the balconies and patios while still maintaining the openness of the patio or balcony.	**Not Applicable.** The proposed project does not include the construction of patios or balconies.
GOAL N-3 **Groundborne Vibration.** An environment that minimizes exposure of sensitive land uses to the harmful effects of excessive groundborne vibration.	**N-3.1 Groundborne Vibration.** Use the Federal Transit Administration and Federal Railroad Administration guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains, construction equipment, and other sources.	**Consistent.** Construction could include activities that may temporarily expose people to ground-borne vibration or ground-borne noise. At a distance of 50 feet, construction related vibration will comply with all vibration-related impact criteria including damage thresholds and potential annoyance. There are no vibration-sensitive structures located within the 15-foot damage zone or 50-foot perceptibility area; therefore, there are no predicted construction-related vibration impacts. Blasting may be required in some areas for the construction of the turbine foundations. If required, construction blasting will be managed with the preparation of a blasting plan for each site. The blasting plan will include identification of planned blasting locations, a description of the planned blasting methods, an inventory of vulnerable structures potentially affected by the planned blasting, and calculations to determine the area affected by the

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		planned blasting. Depending upon the results of the blasting plan, mitigation measures may include coordination with building occupants so that blasting occurs in their absence, or at other acceptable times, to avoid nuisance or annoyance complaints.
Noise Generators		
GOAL N-4 **Transportation-Related Noise Generators.** A noise environment that reduces noise generated from traffic, railroads, and airports to the extent feasible.	**N-4.1 Traffic Noise.** Require that projects proposing General Plan amendments that increase the average daily traffic beyond what is anticipated in this General Plan do not increase cumulative traffic noise to off-site noise sensitive land uses beyond acceptable levels.	**Consistent.** The traffic report prepared for the project concludes that the project is consistent with the identified roadways in the General Plan Mobility Element; and with implementation of the proposed project, the identified roadways are consistent with the threshold capacity ADT. Average daily traffic is not anticipated to increase as a result of the proposed project. Furthermore, project-related construction traffic noise is not predicted to cause any significant airborne-noise impacts at any noise sensitive land uses near the project-area.
	N-4.2 Traffic Calming. Include traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise in development that may impact noise sensitive land uses.	**Not Applicable.** The proposed project will not significantly increase traffic to warrant provision of traffic calming measures.
	N-4.3 Roadway Location. Locate new or expanded roads designated in the Mobility Element in areas where the impact to noise sensitive land uses would be minimized.	**Consistent.** Construction of new roadways and improvements to existing roadways would be compliant with the San Diego County Code of Regulatory Ordinances, including the San Diego County Noise Ordinance.
	N-4.4 Road Improvement Projects. For County road improvement projects, evaluate the proposed project against ambient noise levels to determine whether the project would increase ambient noise levels by more than three decibels. If so, apply the limits in the noise standards listed in Table N-2 for noise sensitive land uses that may be affected by the increased noise levels. For federally-funded roadway construction projects, use the limits in the applicable Federal Highway Administration Standards.	**Not Applicable.** The proposed project is not a County road improvement project.
	N-4.5 Airport Compatibility. Assure the noise compatibility of any development projects that may be affected by noise from public or private airports and helipads during project review by coordinating, as appropriate, with appropriate agencies such as the San Diego County Regional Airport Authority (SDCRAA) and the Federal Aviation Administration (FAA).	**Not Applicable.** The proposed project does not include uses that would be affected by public or private airports and helipads.
GOAL N-5 **Non-transportation-Related Noise**	**N-5.1 Truck Access.** Design development so that automobile and truck access to industrial and commercial properties abutting residential properties is located at the maximum practical distance from residential zones.	**Consistent.** The proposed project is not located in an industrial or commercial zoned property. Although access to the project site is via rural

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Sources. A noise environment that provides minimal noise spillovers from industrial, commercial, agricultural, extractive, and similar facilities to adjacent residential neighborhoods.		roads within residential areas, implementation of mitigation measures identified in the EIR/EIS will reduce potential noise related impacts to levels less than significant.
	N-5.2 Noise-Generating Industrial Facilities. Locate noise-generating industrial facilities at the maximum practical distance from residential zones. Use setbacks between noise generating equipment and noise sensitive uses and limit the operation of noise generating activities to daytime hours as appropriate where such activities may affect residential uses.	**Consistent.** Although the project is not a typical industrial use, the project will be sited to comply with the San Diego County Code of Regulatory Ordinances, including the San Diego County Noise Ordinance. While residences would be located within 1,000 feet of the transmission line, (see Section D.4, Land Use of the EIR/EIS for list of residences with 1,000 feet of the 138 kV gen-tie line) these County jurisdictional residences are not located within a residential zone and are located in the S92 General Rural zone (the S92 zones conditionally permits Major Impact Utilities). Moreover, there are no sensitive uses which would be affected by the implementation of the project. As discussed in the EIR/EIS, operational noise associated with the 138 kV transmission line was determined to be less than significant and noise impacts resulting from operation of wind turbines including those under the jurisdiction of the County were determined to be less than significant with mitigation. Appropriate setbacks will be established between noise generating equipment and noise sensitive uses to avoid adverse noise impacts to surrounding properties and residences. The applicant will also take additional steps to limit the operation of noise generating activities to daytime hours as appropriate where such activities may affect residential uses.
Temporary and/or Nuisance Noise		
GOAL N-6 **Temporary and/or Nuisance Noise.** Minimal effects of intermittent, short-term, or other nuisance noise sources to noise sensitive land uses.	**N-6.1 Noise Regulations.** Develop and regularly update codes and ordinances as necessary to regulate impacts from point, intermittent, and other disruptive noise sources.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
	N-6.2 Recurring Intermittent Noise. Minimize impacts from noise in areas where recurring intermittent noise may not exceed the noise standards listed in Table N-2, but can have other adverse effects.	**Consistent.** Recurring intermittent construction noise (i.e. noise associated with blasting) would

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		be minimized to the extent practicable through the implementation a blasting plan as discussed in Section D.8, Noise of the EIR/EIS. Construction noise would be temporary and mitigation measures will be implemented to minimize construction noise impacts to the extent feasible. Intermittent sound generators associated with the Tule Wind Project will not cause adverse impacts to noise sensitive land uses upon implementation of mitigation measures identified in the EIR/EIS.
	N-6.3 High-Noise Equipment. Require development to limit the frequency of use of motorized landscaping equipment, parking lot sweepers, and other high-noise equipment if their activity will result in noise that affects residential zones.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
	N-6.4 Hours of Construction. Require development to limit the hours of operation as appropriate for non-emergency construction and maintenance, trash collection, and parking lot sweeper activity near noise sensitive land uses.	**Consistent.** The applicant will likely comply with the 7 a.m. to 7 p.m. construction schedule requirements by not performing any construction outside of those times. Construction for non-emergency construction and maintenance would be "appropriate" within the context of the policy if the appropriate County procedures are followed to allow for construction outside of the normally allowed construction hours. County code section 36.423(a) provides that "A person who proposes to perform nonemergency work on a public right-of-way, public utility facility, public transportation facility or some other project for the benefit of the general public, who is unable to conform to the requirements of this chapter may apply to the County for a variance authorizing the person to temporarily deviate from the requirements of this chapter." The County will require The Tule Wind Project to follow this variance procedure if non-emergency construction work is required outside of normal construction hours. The granting of a variance would make the construction noise "appropriate" and therefore, consistent with this policy. If a

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		variance cannot be obtained, however, the Tule Wind Project will be required to conform to the normal hours of construction.
	N-6.5 Special Events. Schedule special events sponsored by the County that may generate excessive noise levels to daytime hours when feasible.	**Not Applicable.** These policies require action by the County, and do not imply action by the applicant.
	N-6.6 Code Enforcement. Provide sufficient resources within the County for effective enforcement of County codes and ordinances.	
Mountain Empire Subregional Plan		
Community Character		
Goal 1: Encourage the development of land in a manner that reinforces the unique identity of the Mountain Empire Subregion and its communities.		**Consistent.** The predominant land use character of the Mountain Empire subregion is overwhelmingly rural residential. The Tule Wind Project would introduce up to 7 wind turbines and a segment of the 138 kV transmission line to the Mountain Empire Subregion. Turbines in the R turbine string would be located approximately 4.5 miles northeast of the community of Boulevard and would be surrounded by turbines of similar size and color. The segment of the 138 kV transmission line under County land use jurisdiction would travel south from the collector substation along McCain Valley Road and west along Old Highway 80 prior to interconnecting with the Boulevard Substation, where existing electrical distribution lines are already located. With implementation of mitigation measures identified in the EIR/EIS, the introduction of a 138 kV transmission line and support structures would not significantly alter the rural character of the lands on which these components would be located. The proposed project would not significantly impact the existing character of the project area; and no unmitigated impact to community character has been identified.
	Policy 1: Development proposals within Rural Village Boundaries should avoid the removal of mature trees.	**Not Applicable.** The project is not located within a Rural Village boundary.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Land Use		
Goal 2: Provide a land use pattern consistent with the subregional population forecast.	**Policy 1:** The landforms of the Subregion are an important environmental resource that should be respected in new development. Hillside grading shall be minimized and designed to blend in with the existing natural contours.	**Consistent.** Roadway design and hillside grading will adhere to the existing natural contours of the topography to the maximum extent feasible.
	Policy 2: Create a buffer area of one hundred and fifty (150) feet in width along the international boundary line inclusive of the existing sixty-foot (60') Public Reserve owned by the Federal Government.	**Not Applicable.** The project is not located along the international border.
	Policy 3: Apply a ninety (90') foot setback within which no new permanent building may be built northerly of the existing sixty (60') foot Public Reserve line. Where such ninety (90') foot setback can be shown to adversely impact a property, the owner may apply for a waiver from complying with the setback as provided for in Section 7060 of The Zoning Ordinance.	
Residential		
Goal 1: Provide a land use pattern that will accommodate the forecast population increase, while retaining the rural charm of the present living environment.	**Policy 1:** Apply a Rural Village Boundary to each of the following historically significant settlements in this Subregional Area, as shown in Figures 2 and 3 on pages 9 and 10, respectively. Campo, Jacumba, Lake Morena, Cameron Corners, and Potrero.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant. The proposed project is outside of the Country Town Regional Land Use Designation.
	Policy 2: Preserve the rural atmosphere of the Subregion by blending roads into the natural terrain.	**Consistent.** Roadway design and hillside grading will adhere to the existing natural contours of the topography to the maximum extent feasible.
	Policy 3: Maintain the existing rural life style by continuing the existing pattern of residential and agricultural uses on large lots outside of the Rural Villages.	**Consistent.** See response to Boulevard Subregional Plan Goal LU 1.1. The proposed project does not include residential or agricultural uses; furthermore, there is no active agricultural within the project area. The rural lifestyle of the community will be maintained, because the Tule Wind Project wind turbines will not disrupt the pace of life in the community or add to the urbanization of the community. The wind turbines are passive generators that operate without significant human intervention. The project will only employ a small staff during operation, which will not significantly expand the population or the need for housing in the area. Therefore, the pace or lifestyle within the community will be unchanged by the construction of the Project. In addition, the area already contains wind turbines, some transmission lines (including the 500KV Sunrise Powerlink), phone lines, and other industrial elements.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	Policy 4: All development proposals shall demonstrate a diligent effort to retain significant existing natural features characteristic of the community's landscape. Existing topography and landforms, drainage courses, rock outcroppings, vegetation, and views shall be incorporated, to the maximum extent feasible, into the future development of the land.	**Consistent.** The applicant will implement mitigation measures identified in the EIR/EIS that would protect the existing natural features characteristic of the community's landscape. Natural features would be incorporated into the design of the Tule Wind Project to the extent practicable. However, due to the type of project proposed and the linear nature of the 138 kV transmission line, the incorporation of mature oaks, trees, and rock formations would not be practical around these project components. Through implementation of mitigation, existing drainage patterns would not be significantly altered, and occurrences of increased erosion and siltation will be reduced to a level less than significant. See responses to goals, objectives, and policies of the Conservation and Open Space Element.
	Residential site design shall avoid: • Level grading of entire lots without respect for existing landforms or neighboring developments; • Removal of oaks without careful consideration; • Blocking existing significant views through the property and within the property; • Diverting natural drainage patterns unless no other alternative is available; and • Creation of a landscape foreign to that of surrounding sites.	**Consistent.** The project does not propose any residential site development. See responses to goals, objectives, and policies of the Conservation and Open Space Element. The applicant will implement mitigation measures identified in the EIR/EIS to minimize the impacts to and preserve the natural contours, channels, and visual character of project site to the maximum extent feasible.
	Policy 6: Minimize the visual impacts of hillside developments with buildings, retaining walls, and other improvements deferring to the natural landforms and kept to as low a profile as possible.	**Consistent.** Project facilities will be sited to minimize visual impacts and adhere to the existing natural contours of the topography to the greatest extent possible; however, turbines will be visible.
	Policy 7: Graded hillsides should approximate the surrounding natural hills. Slope banks should be softened by contoured grading of fill at the top and toe of the slope.	**Consistent.** See response to Residential Goal 1, Policy 6 of the Mountain Empire Subregional Plan.
	Policy 8: Waive concrete curbs, gutters, and sidewalk requirements in new subdivisions to ensure compatibility with existing rural developments.	**Not Applicable.** The project does not include any residential development or curbs, gutters, or sidewalks.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	Policy 9: Preserve open space areas, such as steep slopes and canyons, floodplains, agricultural lands, meadows, and unique scenic views and vistas by clustering residential development away from such areas.	**Consistent.** The project does not propose any residential development. However, the project components will be sited to preserve open spaces, steep slopes and canyons, floodplains, agricultural lands or unique scenic views and vistas, and the applicant will reduce impacts to these resources to the greatest extent possible.
	Policy 10: Buffer residential areas from incompatible activities that create heavy traffic, noise, lighting, odors, dust, and unsightly views	**Not Applicable.** See response in Residential Goal 1, Policy 9 of the Mountain Empire Subregional Plan.
	Policy 11: Avoid all extensive or severe grading to preserve the natural terrain.	**Consistent.** Project facilities will be sited to adhere to the existing natural contours of the topography to the greatest extent possible to preserve the natural terrain.
Commercial		
Goal 1: Provide for the orderly growth of business and professional services and optimize convenience for local and highway-related shopping needs.	**Policy 1:** Protect areas designated for commercial development from encroachment by incompatible non-commercial uses.	**Consistent.** Commercial uses or professional services are not proposed as part of the project. The project area is not located in a designated commercial development area.
	Policy 2: Discourage requests which may lead to mixed residential in commercial areas except those residential uses which are secondary to a commercial use.	**Consistent.** The project does not propose any mixed residential uses in commercial use areas.
	Policy 3: Upgrade existing "strip" commercial by providing landscaping and clearly defined parking and access areas	**Consistent.** See previous response to Commercial Goal 1, Policy 1.
	Policy 4: To create shade for the comfort of pedestrians, design the south-facing facades of businesses to include arcades, porches or trellised walkways	**Not Applicable.** See previous response to Residential Goal 1, Policy 8.
	Policy 5: Cooperate with the federal and state governments at the time the Port of Entry at Tecate is redesigned.	**Not Applicable.** The project area is not located adjacent to the U.S./Mexico border in the vicinity of the Tecate Port of Entry.
	Policy 6: Limit new commercial uses to sites within the Rural Village Boundaries.	**Not Applicable.** The project area is not located in a Rural Village.
	Policy 7: Ensure that all development be planned in a manner that provides adequate public facilities prior to or concurrent with need.	**Consistent.** The project is not anticipated to impact any public services or facilities, other than fire agencies. The applicant developed a multi-agency FPP for the Tule Wind Project. The FPP was approved by the SDRFPD in November 2010 and accepted by the SDCFA in February 2011. The applicant and the SDRFPD entered into a Fire and Emergency Protection Services agreement on November 2, 2010. The applicant is currently in negotiations with the SDCFA to

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		finalize a Fire Services Agreement for provision of fire services within the County CSA-135. Upon certification of the FEIR/FEIS, and prior to the project being heard by the County Board of Supervisors, the applicant and the SDCFA will finalize negotiations on the agreement.
	Policy 8: Soften the visual impact of parking areas by screening all parking areas from street view, by interrupting continuous rows of parking spaces with planting, and by creating planted canopies over parking areas to lessen heat build-up.	**Not Applicable.** The project is not considered a commercial project that would be subject to parking lot design requirements. The parking area at the O&M building is not anticipated to be in view of nearby residences.
	Policy 9: Parking lots for commercial uses may utilize permeable surfacing materials, such as gravel or decomposed granite, in order to minimize surface runoff and maximize groundwater recharge.	
	Policy 10: Commercial parking areas adjacent to residentially zoned property must be completely screened from view of the residential property with a 72 inch high solid fence, wall, hedge, or other dense plant material. The following plant species would be appropriate if a vegetative screening is to be utilized: a. San Diego Mountain Mahogany (*Cercocarpus minutiflorus*); 4'-15'. b. Toyon (*Heteromeles arbutifolia*); 8'-15' with flowers and berries. c. Hollyleaf cherry (*Prunus ilicifolia*); 8'-20' with flowers and berries. d. California scrub oak (*Quercus dumosa*); 8'-10'. e. Coffeeberry (*Rhamnus California*); 5'-15' with flowers and berries. To provide an effective screening, these plants should be planted four to five feet apart. These suggested plants are all native evergreens that naturalize after two growing seasons (two winters). They will require water during the summer in order to ensure adequate adaptation, and are not effective in areas over 4,000 feet in elevation.	
	Policy 11: Plan for land use development that would contribute to the cultural and economic relationship between Tecate, USA and Tecate, Mexico.	**Not Applicable.** See response in Commercial Goal 1, Policy 5.
	Policy 12: In Tecate, explore the potential for development of agricultural services and agri-tourism to promote East County agricultural products.	
Industrial Goal		
Goal 1: Provide a land use pattern which will permit those kinds of Industrial uses that will not detract from the rural charm and lifestyle of the subregion.	**Policy 1:** Preserve those existing industries that are compatible with a rural lifestyle.	**Consistent**. There are no existing rural industries within the location of the project site to preserve. Therefore, the project is consistent with this policy.
	Policy 2: New industrial development should be clean, non-polluting, and complementary to a rural area.	**Consistent.** The Tule Wind Project is not an industrial use.
	Policy 3: Industrial development in Tecate should not adversely affect the excellent air quality of the Potrero area.	**Not Applicable.** The project is not proposed in Tecate.
	Policy 4: Ensure that all development be planned in a manner that provides adequate public facilities prior to or concurrent with need.	**Consistent.** See response to Commercial Goal 1, Policy 7 of the Mountain Empire Subregional Plan.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	Policy 5: New industrial development should consider all views into the property from public streets, adjacent properties, and residences on nearby hills.	**Consistent.** The project was designed in consideration of the views from public streets, adjacent properties, and residences on nearby hills.
	Policy 6: Concentrate future industrial development in those Rural Village areas already designated or planned for industrial uses.	**Not Applicable.** The project is not an industrial development, nor is it proposed in a Rural Village or areas designated for industrial uses.
	Policy 7: Apply heavy industrial designations sparingly to avoid uses that can create noise, dirt, air pollution, other forms of pollution, and congestion.	
	Policy 8: Upgrade existing industrial developments by providing landscaping and clearly defined parking and access area. Soften the visual impact of parking areas for new development by providing landscaped screening and by interrupting continuous rows of parking spaces with plantings of shade trees.	
	Policy 9: Parking lots for industrial uses may utilize permeable surfacing materials, such as gravel or decomposed granite, in order to minimize surface runoff and maximize groundwater recharge.	**Consistent**. A 10-acre temporary graveled parking lot (on BLM lands) is proposed to be utilized throughout construction and will be revegetated to its natural state after construction. The parking area for the O&M building will be small, not utilized by the general public, and sufficiently impervious.
	Policy 10: Industrial parking areas adjacent to residentially zoned property must be completely screened from view of the residential property with a 72 inch high solid fence, wall, hedge, or other dense plant material.	**Consistent.** Fencing will be provided around the O&M building and substation.
	Policy 11: Large unbroken expanses of wall shall be avoided. If this is not possible, architectural details and/or landscaping shall be utilized to soften straight unbroken facades.	**Consistent.** Walls are not proposed as part of the project.
Agricultural		
Goal 1: Encourage the expansion and continuance of agricultural uses in the subregion.	**Policy 1:** Study and determine the possible benefit from promoting agricultural uses in the Subregion. Explore the potential for development of agricultural services and agritourism in Tecate to promote East County agricultural products.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
Specific Plan Areas		
	Kechum Ranch Specific Plan Area Tecate Special Study Area	**Not Applicable.** The project is not located within or adjacent to the Kechum Ranch Specific Plan area or the Tecate Special Study Area.
Housing		
Goal 1: Ensure that adequate, affordable shelter is provided for all Residents of the mountain empire subregion in a way that is consistent with its rural character.	**Policy 1:** Take those steps necessary to ensure that the private sector is able to provide for the housing needs of the Subregion's low and moderate income households.	**Not Applicable.** The proposed project does not include residential development nor does the project site contain existing housing.
	Policy 2: Designate appropriate parcels within the Subregional communities for multifamily or mixed use development.	
	Policy 3: Identify and inventory areas with underused infrastructure when revising this Subregional Plan. This could be instrumental in minimizing housing costs, as well as actualizing economics from infilling.	
	Policy 4: Study and determine if there is a need for farm employee housing in the Subregion.	
	Policy 5: Study and determine if there is a need for creating emergency housing for the homeless in the	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	Subregion.	
	Policy 6: If a project is in conformance with the General Plan and if the Subregion has had a certified Environmental Impact Report (EIR) done for it, then the EIR may be used as a master environmental assessment. This would provide the applicant with a central source of current information on potential regional impacts, including the cumulative and growth inducing impacts of the project, making it necessary to address only site specific impacts.	**Consistent.** An EIR/EIS was prepared for the proposed Tule Wind Project. It is anticipated that the EIR/EIS will be certified by the CPUC and approved by the BLM in Fall 2011.
	Policy 7: The demand for low income housing anticipated for the Potrero Valley Planning Area can be accommodated at the Twin Lakes Trailer Park.	**Not Applicable.** Policy noted.
Mobility		
Goal 1: Improve the transportation system to provide for safe and efficiently maintained travel throughout the subregion, while maintaining the rural atmosphere and natural beauty of the area.	**Policy 1:** Consider prohibiting trucks, one ton and over, from parking on Thing and Emery Roads in Tecate.	**Not Applicable.** The project site is not located in the Tecate area.
	Policy 2: Request CalTrans to study the safety aspects of SR-94 in the vicinity of Tecate Road.	
Public Facilities and Services		
Goal 1: Provide the facilities and level of service necessary to satisfy the needs of the subregion.	**Policy 1:** Maintain unobstructed access to and along the path of existing power transmission facilities and lines.	**Consistent.** The applicant will maintain unobstructed access along the path of the proposed 138 kV transmission line along McCain Valley Road.
	Policy 2: Any proposed grading, improvements, or other encroachments to the substation or transmission right-of-ways must be reviewed by SDG&E.	**Consistent.** The Tule Wind Project is part of a larger project with SDG&E, and coordination has already been initiated. Additionally, an MUP application was submitted to the County with proposed grading and plot plans as part of the permit for review and approval.
	Policy 3: Any alteration of drainage patterns affecting the substation or transmission line right-of-ways should be reviewed and approved by SDG&E.	
	Policy 4: Uses proposed for property adjacent to substations or transmission line right-of-ways should be reviewed for possible impacts to the power facilities and vice versa.	
Conservation		
Goal 1: Ensure that there is careful management of environmental resources in the area in order to prevent wasteful exploitation or degradation of those resources and to maintain them for future needs.	**Policy 1:** All development shall demonstrate a diligent effort to retain as many native oak trees as possible.	**Consistent.** The project may require removal of approximately 3.82 acres of native oak trees (closed and open coast live oak woodland). The applicant will mitigate the removal of native species through a combination of habitat compensation and habitat restoration at a minimum of 1:1 ratio or as required by the permitting agencies.
	Policy 2: Encourage sewer districts to implement a wastewater reclamation program in areas where groundwater is not abundant.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
	Policy 3: Floodways shall be maintained in their natural state unless findings can be made that a threat to public safety exists.	**Consistent.** Proposed project improvements will aim to mimic existing drainage patterns and will

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		minimize redirection of any flows. All drainages will be left in a natural condition and the project development will not impact flow patterns in drainages. The project area is not located within any FEMA designated Special Flood Hazard Area. Firm panels indicate the Project site is Zone D, area of undetermined but possible flood hazards. The *CEQA Drainage Study* prepared for the project concludes that project impacts (from a flood impact standpoint) are determined to be negligible.
	Policy 4: The dark night sky is a significant resource for the Subregion and appropriate steps shall be taken to preserve it.	**Consistent.** The applicant is taking appropriate steps to preserve dark skies; and will implement mitigation measures to avoid negatively impacting dark skies of Boulevard, although the Final EIR/EIS may conclude that not all impacts will be mitigated below a level of significance. FAA-required aviation warning lighting associated with operation of proposed wind turbines would contribute nighttime lighting to the dark sky environment near the Boulevard community. FAA obstruction lighting is required by the federal government and mitigation would be implemented to ensure that exterior turbine lighting is restricted to aviation warning lights. The applicant will ensure that lighting and reflectors installed at project facilities are not visible from public viewing areas, are positioned to reduce reflected glare, and impacts on nighttime sky are minimized. Implementation of mitigation measures identified in the EIR/EIS will ensure that a) exterior light fixtures are hooded and directed downward; b) the project is consistent with the County Light Pollution Code and County Zoning Ordinance (Section 6322 and 6324); and 3) nighttime lighting at the collector substation and O&M facility would not conflict with the operation and research endeavors of

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		local observatories.
	Policy 5: Development shall not adversely affect the habitat of sensitive plant and wildlife species or those areas of significant scenic value.	**Consistent.** As discussed in the EIR/EIS, construction and operation of the Tule Wind Project (including components on lands within the jurisdiction of the County) would result in temporary and permanent impacts to native vegetation communities and would result in the indirect loss of sensitive wildlife species. To minimize impacts, mitigation measures including habitat compensation and re-vegetation are proposed. With implementation of applicable mitigation measures identified in the EIR/EIS, components of the Tule Wind Project within the jurisdiction of the County would be consistent with this policy The compensatory mitigation detailed in the Conceptual Mitigation Plan for the Tule Wind Project is designed to provide for long-term suitable habitat use by the impacted species that may be subject to potential impacts resulting from the Tule Wind Project.
	Policy 6: The Jacumba Hotel should be restored, if at all possible.	**Not Applicable.** Policy noted.
Recreation		
Goal 1: Support recreational opportunities to meet community needs and enrich the lives of all residents by establishing a balanced system of recreation facilities and services.	**Policy 1:** Through the cooperation of the San Diego County Parks and Recreation Department and local sponsor groups, the coordination and maximum use of existing recreational facilities shall be undertaken.	**Consistent**. The proposed project does not include uses that would require the construction of recreational facilities; nor would the project impact any county recreational facilities. The applicant is however providing enhancements to local campground facilities that all residents of the County could enjoy.
	Policy 2: Future development of park and recreation facilities are to be coordinated with the location and needs of local school facilities in order to promote joint use and most effective use of resources.	
	Policy 3: So that Park Land Dedication Ordinance Funds may be used to develop local park facilities, County Service Areas, alternative taxing agencies, or other organizations are to be created to provide ongoing park maintenance and operation services for each community requiring park facilities within the Subregion.	
	Policy 4: In order to proceed with any local park improvements, joint powers or cooperative agreements will be required with the affected community organization. These agreements will be prepared when local groups have established maintenance and operation capabilities.	
	Policy 5: Future Development - Regional Facilities: as funds become available, additional water-related activities may be developed at John Lyons – Lake Morena Park.	
	Policy 6: Future Development - Local Facilities: The Mountain Empire Subregion meets the County General Plan goal for local park land provided per 1,000 in population. Consequently, County Parks Department and local Sponsor Group's review of park and recreation needs has concentrated on facility development rather than acquisition. Review of possible future acquisition needs should occur along with	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	large scale development proposals. Facility development is recognized and prioritized as follows and is to occur as staffing, funding, and maintenance and operation capabilities become available. a. Jacumba - Develop local park facilities at the 20-acre Jacumba Community Park site in accordance with Jacumba Community Service Districts maintenance capabilities and the needs of the citizens of Jacumba. b. Campo - Expand or improve local park facilities at the Campo Community center site, leased from the County by the Lake Morena/Campo Fund, Inc. Organization, to meet the needs of the citizens of the Campo Community and the organization's operation and maintenance capabilities. Establish a local Historical Society Chapter at the Campo Stone Store to enhance and protect its State Historical Designation and to preserve local historical culture, artifacts, and information. c. Tecate - No park facilities are planned for the near term. If additional local park land is needed to serve the forecast population, means to acquire additional parkland will be assessed.	
	Policy 7: Local Park Acreage Goals The County General Plan Conservation and Open Space Element, Parks, Open Space, and Recreation section establishes a goal of ten acres of local park land for every 1,000 persons. Aggregate totals for the Mountain Empire Subregion show that it currently has 15.3 acres of local park land for every 1,000 population, which by the year 2030 this will shrink to 10.0 acres per 1,000 population.	**Consistent.** See response to Recreation Goal 1, Policy 6 of the Mountain Empire Subregional Plan.
	Policy 8: The Jacumba Sponsor Group recommends that Park Land Dedication fees collected from the Ketchum Ranch Specific Plan area be spent for park and recreation facilities within the Jacumba Planning area.	**Not Applicable.** The project area is not located in the Ketchum Ranch Specific Plan area.
Energy Conservation		
Goal 1: Ensure that the conservation of non-renewal energy resources is pursued in a way that is not detrimental to the rural lifestyle.	**Policy 1:** New development should utilize alternative energy technologies, especially active and passive solar energy systems.	**Consistent.** The project is a utility scale renewable energy project which would generate and transmit clean renewable energy to approximately 60,000 residences per year.
	Policy 2: Protected courtyards, porches, arcades, loggias, verandas, and overhangs are effective means of shading exterior wall surfaces and windows from direct sun exposure. These elements are easily added to buildings as temperature moderating elements. An additional benefit is their ability to add character to a building.	**Not Applicable.** The project does not include uses that would typically utilize courtyards, porches, arcades, or verandas.
	Policy 3: Deciduous trees used on the south and west sides of a building can provide shade in summer, while allowing sun penetration in winter.	**Consistent.** The only landscaping proposed will be located in the area of the O&M facility. It is not anticipated additional landscaping will be required by the County; however, the applicant will comply with all conditions of approval, including landscaping requirements.
	Policy 4: Roof overhangs on south facing walls offer effective protection of window areas from summer sun, while admitting lower winter sun rays.	**Consistent.** The O&M facility will be a pre-fabricated structure. The roof overhangs are anticipated to be pre-determined by the manufacturer, although energy saving design is anticipated to be part of the building design.
	Policy 5: South-facing courtyards may be used to create protected outdoor spaces, giving the site a more favorable micro climate for year-round activities.	**Not Applicable.** The project does not contain typical development that necessitates the

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		construction of a courtyard.
Scenic Highways		
Goal 1: Establish a network of scenic highway corridors within which scenic, historical and recreational resources are protected and enhanced.	Finding: There are eight scenic corridors identified on the Scenic Highways Figure C-5 in the County General Plan Conservation and Open Space Element that pass through the Mountain Empire Subregional Plan Area. 1. Tecate Road (State Route 188), from the Mexican border north to State Route 94; 2. Potrero Valley Road, from State Route 94 to Potrero County Park; 3. Lake Morena Drive from Buckman Springs Road, north to Morena Lake; 4. Oak Drive, from Lake Morena Drive North to Buckman Springs Road. 5. Interstate 8, from State Route 79 east to the Imperial County Line; 6. State Route 94, from State Route 125 to Interstate 8; 7. Buckman Springs Road, from Lake Morena Drive to State Route 94; and. 8. Old Highway 80, from the Central Mountain Subregion to Interstate 8.	**Consistent.** The project area is located north of Interstate 8, within the portion identified as a scenic corridor between State Route 79 east to the Imperial County Line. It is also in close proximity of Old Highway 80 within the community of Boulevard. The project area will not have any turbines located on County Jurisdictional land that can be viewed from these two scenic highways. The remaining amount of turbines visible from Highway 8 at a distance of approximately three miles are located on BLM lands. The Generation tie line can be viewed from these scenic highways, but the scenic quality of these views has been disturbed by the approval and implementation of the 500kV Sunrise Powerlink transmission line that is the dominant feature within the viewshed of these highways. Therefore, the smaller gen-tie line would not detract from the quality of these resources.
BOULEVARD PLAN		
1.1 Community Character		
Goal LU 1.1 The continued maintenance of a rural, non-industrial, lifestyle and community character exemplified by a pattern of residential and agricultural uses on large lots outside the Rural Village,		**Inconsistent:** The project is inconsistent with this goal and the policies under this goal. Therefore, a General Plan amendment was requested by the applicant to revise this goal by adding "Section 7. The Tule Wind Project" to the Boulevard Community Plan.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
along with the protection and preservation of open landscapes, unique and geographically extensive views and vistas, dark skies, steep slopes, canyons, and floodplains, while accommodating moderate, responsible, and sustainable growth at a slower rural pace.	**Policy LU 1.1.1** Prohibit higher density, clustered subdivisions, or industrial-scale projects or facilities that induce growth and detract from or degrade the limited groundwater resources, water and air water quality, visual and natural resources, abundant wildlife, and historic rural character of the Boulevard area.	**Inconsistent:** The project is inconsistent with this policy. Therefore, a General Plan amendment was requested by the applicant to revise this policy by adding "Section 7. The Tule Wind Project" to the Boulevard Community Plan.
	Policy LU 1.1.2 Require development to protect the quality and quantity of ground and surface water resources, air quality, dark skies, visual resources, and low ambient noise levels, as well as retain and protect the existing natural and historic features characteristic of the community's landscape and natural environment.	**Inconsistent:** The project is inconsistent with this policy. Therefore, a General Plan amendment was requested by the applicant to revise this policy by adding "Section 7. The Tule Wind Project" to the Boulevard Community Plan.
	Policy LU 1.1.3 Require development to respectfully incorporate existing topography and landforms, watersheds, riparian areas, oaks, and other native vegetation and wildlife, ridgelines, historic and cultural resources, views, and sustainability design factors.	**Consistent.** Natural features would be incorporated into the design of the Tule Wind Project to the extent practicable. However, due to the type of project proposed and the linear nature of the 138 kV transmission line, the incorporation of mature oaks, trees, and rock formations would not be practical around these project components. As discussed in the EIR/EIS, construction and operation of the Tule Wind Project (including components on lands within the jurisdiction of the County) would result in temporary and permanent impacts to native vegetation communities and would result in the indirect loss of sensitive wildlife species. The majority of native vegetation impacts would not occur with the Boulevard community plan area and construction of the 138 kV transmission line will not result in substantial impacts to native and riparian vegetation such that the character of Boulevard would be significant altered due to construction activities. To minimize impacts, mitigation measures including habitat compensation and re-vegetation

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		are proposed. With implementation of applicable mitigation measures identified in the EIR/EIS, components of the Tule Wind Project within the jurisdiction of the County would be consistent with these objectives. The compensatory mitigation detailed in the Conceptual Mitigation Plan for the Tule Wind Project is designed to provide for long-term suitable habitat use by the impacted species that may be subject to potential impacts resulting from the Tule Wind Project.
	Policy LU 1.1.4 Require commercial and public development along scenic and historic routes to apply designs standards that will blend the development in with the terrain and rustic south western nature of the community character, while keeping outdoor lighting to an absolute and well shielded minimum.	**Consistent.** The proposed project is not considered a commercial or public development. However, the project was designed in consideration of the natural terrain and topography of the project area. Outdoor lighting will also be kept to an absolute and well shielded minimum for safety purposes.
	Policy 1.1.5 Require development to utilize protected courtyards, porches, arcades, verandas and overhangs as a means to reduce energy consumption, provide shade, and add rustic character to buildings.	**Not Applicable.** These design standards apply more to residential type development, as opposed to renewable energy facilities.
	Policy 1.1.6 Require landscaping in new development to emphasize the use of xeriscape design with native, drought-tolerant, and fire-resistant plants to conserve water resources and help prevent the spread of fire.	**Consistent.** Native, drought-tolerant, and fire-resistant plants that conserve water resources and help prevent the spread of fire will be provided where deemed necessary by the County of San Diego.
Goal LU-1.2 The preservation of groundwater resources, community character, and protection of sensitive resources in the Boulevard Subregional Planning Area.	**Policy LU-1.2.1** Require lot sizes, except through planned development, lot area averaging, or specific plan projects, to be no smaller then: • 50% of the size indicated on the Land Use Map, without clustering or lot averaging, for Semi Rural 4 and higher densities, or • Eight acres for Semi Rural 10 and lower densities.	**Consistent.** New lots are not proposed as part of the project; therefore, clustering, lot averaging, or planned development standards are not applicable. However, the proposed project will be developed in accordance with the Groundwater Policy and Groundwater Ordinance, and will not impact groundwater resources. See response to Policy COS-5.5 of the Conservation and Open Space Element above.
	Policy LU-1.2.2 Allow further reductions in minimum lot sizes indicated in Policy LU-1.2.1, through planned development, lot area averaging or specific plan projects, only when setbacks and building scale and design are appropriate to retain community character in the area, and when such reductions will not negatively impact groundwater resources.	
	Policy LU-1.2.3 Require planned developments, lot area averaging or specific plan projects to have minimum lot sizes of four acres or the average lot size of adjacent parcels, whichever is smaller; provided the project does not have more significant impacts to groundwater resources then a conventional subdivision and uses a shared water system.	
Goal LU 1.3 The protection of the integrity and value of the visual,	**Policy LU 1.3.1** Encourage and promote local and on-site energy conservation, residential-scale renewable energy production, and zero waste recycling goals that will help eliminate the need for	**Not Applicable.** This policy is not applicable to this project because the project is a large scale

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
historical, cultural, and natural resources along with agricultural, ranch, and public lands. All of which make Boulevard a nice place to live, work, and play.	industrial scale projects and facilities.	renewable energy project that does not regulate on-site energy conservation residential-scale renewable energy production, and zero waste recycling goals. .
	Policy LU 1.3.2 Require development, including regional infrastructure, public facilities, and industrial scale energy generation and transmission projects, to comply and maintain a rural bulk and scale in accordance with Boulevard's community character.	**Inconsistent:** The project is inconsistent with this policy. Therefore, a General Plan amendment was requested by the applicant to revise this policy by adding "Section 7. The Tule Wind Project" to the Boulevard Community Plan.
Goal LU 2.1 Increased community activity involving the designation of Historic Route 80 and increased opportunities for small business, recreation, and tourism to display the historic, natural, and cultural resources that are prevalent through out the region.	**Policy LU 2.1.1** Promote Boulevard's unique community character, resources, ambiance, and appeal to encourage and support business opportunities in Boulevard that display the historic, natural, and cultural resources that are prevalent through out the region.	**Consistent.** The Tule Wind Project will not have an effect on the County's ability to appeal, encourage, or support future business opportunities in Boulevard.
1.3 Community Conservation & protection		
Goal LU 3.1 Protection as a Dark Sky Community through preservation of the dark skies in Boulevard to support the continued operation of the San Diego Astronomy Association and Tierra Del Sol Observatories and to continue to attract stargazers, photographers, scientists, and researchers from around the world.	**Policy LU 3.1.1** Encourage development to preserve dark skies with reduced lighting and increased shielding requirements.	**Consistent.** Mitigation measures will be implemented to preserve dark skies. The applicant will ensure that lighting and reflectors installed at project facilities are not visible from public viewing areas, are positioned to reduce reflected glare, and impacts on nighttime sky are minimized. The project will be in compliance with the County Dark Sky Ordinance and will not interfere with increased resources or methods for enforcing dark skies. The Tule Wind Project would be located primarily within Zone A as measured from the Mount Laguna Observatory. The Tule Wind Project will be compliance with lamp type and shielding requirements for Class II Lighting within Zone A which state that lamps should be low-pressure sodium and fully shielded. Implementation of mitigation measures identified in the EIR/EIS will ensure that a) exterior light fixtures are hooded and directed downward; b) the project is consistent with the County Light
	Policy LU 3.1.2 Encourage increased resources or methods for enforcement for the preservation of dark skies.	

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		Pollution Code and County Zoning Ordinance (Section 6322 and 6324); and 3) nighttime lighting at the collector substation and O&M facility would not conflict with the operation and research endeavors of local observatories.
Goal LU 3.2 Preservation of the native and riparian habitat to retain the distinctive character of the Boulevard community.	**Policy LU 3.2.1** Require development to minimize impacts to the native and riparian habitat.	**Consistent.** No unmitigated impacts to natural resources would occur, and the project is consistent with the provisions of the County's Resource Protection Ordinance and Biological Mitigation Ordinance. As discussed in the EIR/EIS, construction and operation of the Tule Wind Project (including components on lands within the jurisdiction of the County) would result in temporary and permanent impacts to native vegetation communities and would result in the indirect loss of sensitive wildlife species. The majority of native vegetation impacts would not occur with the Boulevard community plan area and construction of the 138 kV transmission line will not result in substantial impacts to native and riparian vegetation such that the character of Boulevard would be significant altered due to construction activities. To minimize impacts, mitigation measures including habitat compensation and re-vegetation are proposed. With implementation of applicable mitigation measures identified in the EIR/EIS, components of the Tule Wind Project within the jurisdiction of the County would be consistent with this policy. The compensatory mitigation detailed in the Conceptual Mitigation Plan for the Tule Wind Project is designed to provide for long-term suitable habitat use by the impacted species that may be subject to potential impacts resulting from the Tule Wind Project.
Goal LU 3.3 The protection,	**Policy LU 3.3.1** Encourage the designation, protection, and long-term management of historic sites in the	**Not Applicable.** This policy requires action by

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
preservation, and management of historic structures and sites in Boulevard.	Boulevard area.	the County, and does not imply action by the applicant.
1.5 Community Facilities		
Goal LU 5.1 Adequate facilities, infrastructure, and equipment that enable the Boulevard Fire and Rescue Department to fulfill its mission.	**Policy LU 5.1.1** Seek funding and promote efforts to provide the necessary facilities, infrastructure, and equipment to support the Boulevard Fire and Rescue Department.	**Consistent.** The applicant has agreed to provide funding for the training and acquisition of necessary firefighting equipment and services to the local fire authorities to improve the response and firefighting effectiveness throughout the project area and surrounding community. The applicant developed a multi-agency Fire FPP for the Tule Wind Project. The FPP was approved by the SDRFPD in November 2010 and accepted by the SDCFA in February 2011. The applicant and the SDRFPD entered into a Fire and Emergency Protection Services agreement on November 2, 2010. Tule Wind LLC is currently in negotiations with the County Fire Authority to finalize a Fire Services Agreement for provision of fire services within the County CSA-135. Upon certification of the FEIR/FEIS, and prior to the project being heard by the County Board of Supervisors, Tule Wind LLC and the County Fire Authority will finalize negotiations on the agreement. The County Fire Authority will then provide a signed Form 399-F to DPLU upon approval of the Tule Wind Project. The FPP requires, among other things, the implementation of specific mitigation measures at the Tule Wind Project site to reduce fire risk. The project design features and mitigation measures proposed to minimize the potential for an ignition include: automatic fire suppression systems in the wind turbine nacelle(s), various design features such as arc flash relays, fuel management around project features (i.e., 100' clearance around turbines with fire-safe vegetation and annual fuel management), four (4) 10,000 gallon water storage tanks installed throughout the project area that can be utilized for regional fire suppression support, training of

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		both construction and operational personnel by SDRFPD personnel, or another entity certified to conduct such training, on the proper use of Type VI firefighting equipment to fight incipient fires, and funding for both the SDCFA and the SDRFPD for training and acquisition of fire equipment and apparatus. Not only has the project applicant minimized the risk of potential ignition sources resulting from the project, but it will also improve access and response times throughout the project area, and provide water for wildland firefighting within the large expanse of BLM lands that do not currently have access or water. Implementation of APMs and mitigation measures would reduce the fire risk and probability of a wildfire to a level less than significant.
1.6 Other Topics/Issues		
Goal LU 6.1 Boulevard retains its community character by limiting any commercial or industrial development that negatively impacts our community and its resources.	**Policy LU 6.1.1** Require industrial development to mitigate adverse impacts to avoid detracting from or negatively impacting the rural community character, charm, quiet ambiance and life-style, or the natural resources, wildlife, and dark skies of Boulevard.	**Inconsistent:** The project is inconsistent with this policy. Therefore, a General Plan amendment was requested by the applicant to revise this policy by adding "Section 7. The Tule Wind Project" to the Boulevard Community Plan.
	Policy LU 6.1.2 Require industrial development to create and maintain adequate buffers to residential areas from incompatible activities that create heavy traffic, noise, infrasonic vibrations, lighting, odors, dust and unsightly views and impacts to groundwater quality and quantity.	**Inconsistent:** The project is inconsistent with this policy. Therefore, a General Plan amendment was requested by the applicant to revise this policy by adding "Section 7. The Tule Wind Project" to the Boulevard Community Plan.
	Policy LU 6.1.3 Require industrial development to provide buffers from public roads, adjacent and surrounding properties and residences, recreational areas, and trails.	**Inconsistent:** The project is inconsistent with this policy. Therefore, a General Plan amendment was requested by the applicant to revise this policy by adding "Section 7. The Tule Wind Project" to the Boulevard Community Plan.
	Policy LU 6.1.4 Prohibit industrial or commercial development with unmitigated and unmitigable impacts to the Boulevard area, such as:	**Inconsistent:** The project is inconsistent with this policy. Therefore, a General Plan

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
	• Unregulated maintenance and operation of equipment that poses health and safety concerns to the general public, including fires ignited from malfunctioning industrial wind turbines and related equipment; • Insufficient setbacks to minimize shadow flicker; • Inadequate setbacks from adjacent private property relative to tower height to mitigate against tower collapse and blade shedding; • Impairment of visual resources and the rural community character; • Insufficient setbacks to mitigate noise impacts, as defined by Safety Element Tables N-1, Noise Compatibility Guidelines, and Table N-2, Noise Standards; • Seismic wave impacts, ground vibrations, and chemical and oil spills; • Light pollution of dark sky resources and shadow flicker effect that create a nuisance, and result in negative impacts to health and quality of life.	amendment was requested by the applicant to revise this policy by adding "Section 7. The Tule Wind Project" to the Boulevard Community Plan.
2.2 Local Road Network		
Goal CM 2.1 A safe and efficient road network designed to be safe for all users, while maintaining the rural community character.	**Policy CM 2.1.1** Prohibit paved sidewalks, curbs and gutters, paved road shoulders, and street lighting, unless necessary to meet safety requirements.	**Consistent.** Sidewalks, curbs and gutters, paved road shoulders, and street lighting are not proposed as part of the Tule Wind Project.
	Policy CM 2.1.2 Develop rural design guidelines and standards to ensure compatibility with the existing rural environment.	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
	Policy CM 2.1.3 Encourage the use of permeable pavement and design factors that allow for local recharge of precious rainwater and help prevent runoff and erosion.	**Consistent.** Minimal impervious surfaces will be created as part of project implementation. The only components of the project with impervious surfaces will be the turbine foundations. A SWMP was prepared and recommended BMPs will be implemented to reduce potential for water degradation or erosion impacts.
2.3 Fire Access/Egress Routes		
Goal CM 3.1 Avoid the proliferation of unauthorized access to private property via improperly located, authorized, or secured fire access routes.	**Policy CM 3.1.1** Require secondary fire access/egress routes to connect to a public road, when feasible.	**Consistent.** The proposed project includes construction of new roads that will enable firefighters to reach backcountry areas to put out wildfires, as well as a new road which will provide a second evacuation route from the McCain Valley that will connect Ribbonwood Road to McCain Valley Road.
2.6 Aviation		
Goal CM 6.1 Airports that supplement the health and safety of the community and respect legal processes	**Policy CM 6.1.1** Make it a priority to investigate and coordinate with appropriate agencies to restrict potentially illegal airport activities.	**Not Applicable.** Airport activities are not proposed as part of the Tule Wind Project.
2.7 Parking		

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
Goal CM 7.1 A safe environment along the rural state highway in the Boulevard Rural Village	**Policy CM 7.1.1** Seek a big rig and trailer parking prohibition on SR-94 / Old Highway 80 in the Boulevard Rural Village Boundary	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
2.8 Infrastructure and Utilities		
Goal CM 8.1 Preservation of the quality and quantity of ground and surface water resources to serve the Boulevard community.	**Policy CM 8.1.1** Prohibit development and the exportation or sale of groundwater that would adversely impact the ground and surface water resources.	**Consistent.** The Tule Wind Project will not impact County groundwater resources, and does not propose selling or exporting County groundwater. The *Groundwater Investigation Report* concludes there is an adequate groundwater supply available to meet project demands; and the project will be developed in accordance with County Groundwater Policy I-77
	Policy CM 8.1.2 Coordinate with LAFCO to oppose the development of new water districts and annexation to existing water districts to avoid growth inducement and overdraft conditions.	**Not Applicable.** Creation of water districts or annexation to existing water districts is not proposed as part of the Tule Wind Project.
Goal CM 8.2 Prevention of like or similar projects that have closely spaced septic systems feeding and infiltrating the same aquifer that is used for withdrawal of drinking water.	**Policy CM 8.2.1** Require that any new proposed development require sufficient set back from each other to avoid the potential to contaminate and/or overload the aquifer with pollutants.	**Consistent.** The project construction water needs will be adequately supplied by three existing wells on Rough Acres Ranch. The *Groundwater Investigation Report* provides an analysis of cumulative groundwater extraction operations throughout the area and concludes the project will not exceed the short-or long-term groundwater resources of the area; the project will not significantly adversely affect flora, fauna, springs, streams or nearby water rights of property owners; aquifers underlying the project site will be capable of supplying the water required; and groundwater quality will not be significantly degraded by surface or subsurface discharge of wastewater.
Goal CM 8.4 Enhancement of sewage disposal resources for the health and safety of residents, while limiting unplanned growth from development of sewer systems.	**Policy CM 8.4.1** Coordinate with LAFCO to oppose the development of any new sewer district and/or annexation to existing districts that would be growth inducing, and could represent groundwater contamination at the point of disposal/release.	**Not Applicable.** Creation of water districts or annexation to existing sewer districts is not proposed as part of the Tule Wind Project. Effluent water is not proposed to be used at the Tule Wind Project site.
	Policy CM 8.4.2 For projects, such as the Golden Acorn and La Posta Casinos, support the funding and use of artificial wetlands as an environmentally friendly means to further cleanse the effluent prior to recharging the groundwater, provided they are properly funded, engineered, constructed, maintained, and managed.	
Goal CM 8.5 The avoidance of erosion, the displacement of soil, the loss of topsoil, and the denied and/or displaced recharge of on-site	**Policy CM 8.5.1** Prohibit development from altering natural drainage patterns.	**Inconsistent:** The project is inconsistent with this policy. Therefore, a General Plan amendment was requested by the applicant to revise this policy by adding "Section 7. The Tule

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
groundwater resources		Wind Project" to the Boulevard Community Plan.
	Policy CM 8.5.2 Require all engineered drainage projects to maximize stormwater filtration on-site to prevent the loss groundwater recharge and unnecessary erosion.	**Consistent.** Proposed project improvements will aim to mimic existing drainage patterns and will minimize redirection of any flows. Improvements include graded pads, access roads, utility lines, and engineered crossings at each drainage feature. Project improvements include minimal additional impervious areas. Any increase in runoff resulting from these impacts is determined to be negligible, from a flood impact standpoint. From a water quality standpoint, the SWMP prepared for the project concludes that that the project would have low potential for water quality impacts to the surrounding water bodies, and will not substantially degrade water quality.
Goal CM 8.6 Local residential scale renewable energy projects that are technically feasible and environmentally sensitive	**Policy CM 8.6.1** Encourage the use of existing right-of-way when construction of new transmission lines is required, where technically and economically feasible. Additionally, encourage existing right-of-way over new right-of-way alignments for construction of new transmission lines, when existing right-of-way is insufficient.	**Consistent.** The proposed transmission line will parallel the existing ROWs to the extent possible, including tracing the Sunrise Powerlink ROW.
	Policy CM 8.6.2 Encourage the use of solar and residential scale wind turbines, while discouraging new energy corridors for new transmission lines and fuel pipelines in fire prone and groundwater dependant areas.	**Consistent.** The proposed transmission line will parallel the existing ROWs to the extent possible, including tracing the Sunrise Powerlink ROW. Furthermore, the term "discouraging" is not prohibitory. Accordingly, while establishing the new ROW for a 138kV transmission line for the Tule Wind Project may be discouraged by the County (for example, in favor of utilizing existing ROWs), it is not prohibited by the policy.
Goal CM 8.7 A safe and healthy environment, for man and nature, free of unhealthy and unsightly litter, unnecessary waste, and improper disposal.	**Policy CM 8.7.1** Encourage Zero Waste Management goals through increased recycling and reuse.	**Consistent.** Waste generated during construction would primarily consist of concrete and scrap metal from turbine pad construction, and wood from concrete pad construction. Additional waste consistent with general construction activities would also be generated. Steel scrap and wood waste would be recycled where feasible. Concrete waste would be used as on-site fill or at another site; if concrete waste cannot be reused, then it would be removed to a licensed landfill.

TABLE 2. General Plan Consistency Matrix

Goals & Objectives	Policies	Consistency Analysis
		For portions of the project within the County's jurisdiction, the project will be developed in accordance with the County of San Diego's Construction and Demolition Debris Ordinance to ensure that debris from construction is diverted away from landfills to an appropriate recycling facility.
	Policy CM 8.7.2 Seek funding opportunities to provide adequate and convenient recycling facilities, public drop off bin sites, and semi-annual community cleanup events for large items, appliances, tires and hazardous materials	**Not Applicable.** This policy requires action by the County, and does not imply action by the applicant.
Goal CM 8.8 Improved access to high speed communication services, necessary to satisfy the needs of the Planning Area, in an environmentally safe and aesthetically pleasing manner.	**Policy CM 8.8.1** Require cell tower and other communication facilities to be properly sited, well camouflaged, and to have adequate backup generation, sound buffering, and setback from neighboring properties. Require back up generators to be energy-efficient, emission-free, and sound attenuated and require fuel storage to be carefully and properly located and designed to prevent groundwater contamination from any fuel spill or leak.	**Not Applicable.** Telecommunication facilities are not proposed as part of the Tule Wind Project.

APPENDIX A

Plan Amendment Authorization 3801-11-001

ERIC GIBSON
DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017
www.sdcounty.ca.gov/dplu

July 15, 2011

Tule Wind Development LLC.
Jeffrey Durocher, Iberdrola Renewables
1125 NW Couch Street Suite 700
Portland, Oregon 97209

THRESHOLD DECISION ON PLAN AMENDMENT AUTHORIZATION (PAA)

Mr. Durocher:

In accordance with Board Policy I-63 and the General Plan Amendment and Zoning Guidelines, the Director of Planning and Land Use hereby authorizes the Plan Amendment Authorization (PAA) 3801-11-001 filed on June 1, 2011 for the Tule Wind Farm Project (attached). This authorization allows the processing of a General Plan Amendment (GPA) to modify the requested existing policies of the current Regional Land Use Element and the Mountain Empire Subregional Community Plan.

Limitations of the Plan Amendment Authorization:
The authorization to process a GPA does not imply that a determination has been made that the project is consistent with the General Plan or that environmental constraints do not exist that could render the proposal infeasible. Continued review of all planning and environmental issues will be required to make a complete determination. The Department of Planning and Land Use generally makes a final recommendation or decision to approve or deny a project when all planning analysis and environmental documentation is complete and, if applicable, Planning Group input is received. Comments and information in this letter, or lack thereof, should not be construed as the Department implying an overall recommendation or decision on your project.

Planning Group Recommendation:
The Boulevard Community Planning Group (BCPG) considered your request for a PAA on July 7, 2011 and voted 6-0-0 to recommend denial to the DPLU. The DPLU reviews and considers recommendations from the Community Planning/Sponsor Groups, so it is advised that the applicant work with the BCPG during the remainder of the discretionary process.

Submittal Requirements:
Unless other agreements have been made with County staff, you must submit all of the following items concurrently and by the submittal date listed below. The submittal must be made to the DPLU Zoning Counter at 5201 Ruffin Road, Suite B, San Diego, CA 92123-1666 and must include the following items:

a. A copy of this letter.

b. Submit an application for a General Plan Amendment at the following link http://www.sdcounty.ca.gov/dplu/zoning/formfields/ESUB_GPA.pdf. You will need to schedule an appointment with the zoning counter (858-694-2262) to make your complete submittal. Please make the appointment as soon as possible, as the wait time for appointments fluctuates.

c. In addition, the following information and/or document(s) with the requested number of copies as specified:

Information/Document	**# of Copies**	**CD or Flash Drive with Word and PDF Doc**	**Document Distribution** *(For Admin Purposes Only)*
General Plan Amendment Report	3	WORD & PDF	General Plan Report Business Rule: General Plan Report
Application for a GPA	1	PDF	GPA Application

SUBMITTAL DUE DATE: In accordance with Board Policy I-63, this Plan Amendment Authorization expires two years from the approval date. Therefore, the information requested in this letter must be received by **July 15, 2013**. If you have any questions or need additional information, please contact your Project Manager, Patrick Brown at (858) 694-3011 or Patrick.Brown@sdcounty.ca.gov.

ERIC GIBSON, Director
Department of Planning and Land Use

Attachments: General Plan Amendment Report Outline

cc: HDR Inc. Patrick O'Neil, Project Manager, 8690 Balboa Ave Suite #200, San Diego, CA 92123-1502.
Ed Clark, Director Business Development, Iberdrola Renewables, 1125 NW Couch Street Suite 700 Portland Oregon, 97209.

Harley McDonald, Business Developer, Iberdrola Renewables, 211 Chapalita Drive, Encinitas, CA 92024.
The Boulevard Planning Group, PO Box 1272 Boulevard, CA 91905

email cc: Ed Sinsay, Team Leader, Department of Public Works, M.S.O650
Sami Real, Planning Manager, Department of Planning and Land Use M.S.O650
Mark Mead, Senior Deputy County Counsel, Office of County Counsel, MS A12
Devon Muto, Chief, General Plan Update, Department of Planning and Land Use M.S.O650
Donna Tisdale, P.O. Box 1275 Boulevard, CA 91905
donnatisdale@hughes.net

ATTACHMENT A
GENERAL PLAN AMENDMENT REPORT OUTLINE

CHAPTER 1 – INTRODUCTION

PURPOSE AND APPLICABILITY
AUTHORIZATION
POLICY FRAMEWORK
ORDINANCES AND POLICIES
PROJECT DESCRIPTION

- Graphics should be no larger than 11" x 17" in size
- Include a Vicinity Map at a 400' scale showing the site location, existing roads, parcel lines and land uses within ¼ mile of the project site
- Include Figures at 200' scale showing the site, immediate surroundings, and all any off-site improvements required by the project (e.g. roads, water, sewer); existing land uses, parcel lines, roads and contour lines at a 5' intervals or less

DEVELOPMENT APPROVALS REQUIRED: Description of the implementation permits required (e.g. Rezone, Tentative Map, Major Use Permit), timing, and relationship to Specific Plan implementation

CHAPTER 2 - PROJECT SETTING

LOCATION
PHYSICAL FEATURES
AREA HISTORY
EXISTING LAND USES
PLANNING HISTORY

CHAPTER 3 – GENERAL PLAN AMENDMENT REPORT

PURPOSE OF THE GENERAL PLAN AMENDMENT REPORT
EXISTING SUBREGIONAL PLAN
PROPOSED SUBREGIONAL PLAN
EXISTING REGIONAL CATEGORIES
PROPOSED REGIONAL CATEGORY
EXISTING/ PROPOSED LAND USE DESIGNATIONS

CHAPTER 4 – GENERAL PLAN CONFORMANCE

GUIDANCE: This section addresses the consistency of the proposed plan change with the pertinent goals, objectives, and policies of all of the Elements of the General Plan and the applicable Community/Subregional Plan. The General Plan goal/objective/policy must be stated as written in the General Plan text and then followed by a discussion of the how the proposal is consistent with or furthers achievement of the goal/objective/policy. It is acceptable to group goals/objectives/policies if they are closely related. However, the discussion must clearly indicate how the project is consistent with each of the goals/policies/objectives. The consistency must be based on facts and not on a specific implementing project. For example, if the existing General Plan Designation is (2) Residential (1 du/ac) and the proposal is to change

it to (14) Residential with an implementing RV 15 (Variable Family Residential, 14.5 du/ac) Land Use Regulation, consistency cannot be based on an applicant's proposal for a condominium project with an affordable housing component and recreation facilities. There isn't any way to restrict development of the property to that specific use. If a statement can't be relied upon or implemented, it cannot be used to find consistency. If a Specific Plan is being processed concurrently and the GPAR and Specific Plan text are being prepared as one document, the Specific Plan details can be used to find consistency. Include headings (see below) for each General Plan Element and discuss consistency for each applicable policy/goal/objective.

PART I – OPEN SPACE ELEMENT
PART II - REGIONAL LAND USE ELEMENT
PART III – CIRCULATION ELEMENT
PART IV – RECREATIONAL ELEMENT
PART V – SEISMIC SAFETY ELEMENT
PART VI – SCENIC HIGHWAY ELEMENT
PART VII – PUBLIC SAFETY ELEMENT
PART VIII – NOISE ELEMENT
PART IX – HOUSING ELEMENT
PART X – CONSERVATION ELEMENT
PART XI – ENERGY ELEMENT
PART XII – PUBLIC FACILITIES ELEMENT
PART XVI – MOUNTAIN EMPIRE SUBREGIONAL PLAN
CONCLUSION

APPENDICES

Appendix XX-1 Land Use Analysis of the East County Substation FEIR/EIS:

IBERDROLA
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1 of July, 2011

Patrick Brown
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: Tule Wind Project Plan Amendment Authorization and the County General Plan Update

Dear Mr. Brown:

On May 31, 2011, Tule Wind, LLC (Tule Wind) submitted its Plan Amendment Authorization (PAA) request to Director Gibson requesting his authorization for Tule Wind to pursue two amendments to the County General Plan in parallel with its application for a Major Use Permit (MUP) for the Tule Wind Project. Director Gibson has taken the PAA under consideration and we are awaiting his determination.

I understand that the County Board of Supervisors is considering a comprehensive General Plan Update. The Board will next consider the General Plan Update on August 3, 2011, and it is possible that the Board could approve the October 2010 version of the General Plan Update at that time (or, if not on August 3rd, at some point prior to the date when the Tule Wind Project may come before the Board for approval).

If the Board approves the General Plan Update before considering the Tule Wind Project's MUP, it will eliminate Tule Wind's need to pursue the two General Plan amendments requested in the May 31, 2011, PAA. *See* Attachment A, Tule Wind, LLC's PAA (May 31, 2011), at 1 (noting that the October 2010 version of the General Plan Update will moot Tule Wind's two amendment requests). If the Board also adopts the October 2010 version of the Mountain Empire Subregional Plan for the Boulevard Subregional Planning Area (Boulevard Plan) when it approves the General Plan Update, however, it will introduce several policies that would need to be amended prior to the Board's approval of the Tule Wind Project.[1]

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[1] *See* October 2010 General Plan Update, Mountain Empire Subregional Plan, Boulevard Subregional Group Area, Policies LU 1.1.1 (prohibiting industrial development that induces growth and detracts from or degrades air, water, visual, wildlife, historic resources), 1.2.2 (requiring industrial energy development to maintain a rural bulk and scale), 6.1.4 (prohibiting industrial development with immitigable impacts), and CM 8.5.1 (prohibit development from alternating natural drainage).

IBERDROLA RENEWABLES, Inc.
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IBERDROLA
RENEWABLES

You have indicated to us that if the Board approves the General Plan Update prior to considering the Tule Wind Project's MUP, Director Gibson will not require Tule Wind to resubmit its PAA to initiate amendments to the Boulevard Plan, but instead, will use Tule Wind's May 31st PAA to amend the Boulevard Plan. This letter confirms our understanding of how Director Gibson will approach this issue, and supplements our May 31st PAA.

Attached to this letter please find Tule Wind's proposed amendments to Boulevard Plan Policies LU 1.1.1, 1.2.2, and 6.1.4, and CM 8.5.1, which Tule Wind submits for Director Gibson's consideration in the event that the Board approves the General Plan Update prior to considering the Tule Wind Project's Major Use Permit. *See* Attachment B, Tule Wind, LLC's Proposed Amendments to the October 2010 Mountain Empire Subregional Plan, Boulevard Subregional Group Area.

Furthermore, I note that Tule Wind's May 31, 2011, PAA also requests that the County process an amendment to the County's wind zoning ordinance, County Zoning Ordinance § 6951. *See* Attachment A, Tule Wind, LLC's PAA (May 31, 2011), at 7-9. Even if the Board approves the General Plan Update prior to considering the Tule Wind Project's MUP, Tule Wind still requires the Board to consider its wind zoning ordinance amendment.

Please do not hesitate to contact me if you have any issues you wish to discuss or if this letter does not correctly describe Director Gibson's understanding of the matter.

Sincerely,

Jeffrey Durocher
Senior Permitting Manager

Enclosures

Cc: Eric Gibson, County of San Diego
Harley McDonald, Iberdrola Renewables, Inc.
Phil Rath, Public Policy Strategies, Inc.
Christopher W. Garrett, Latham & Watkins LLP
Ryan R. Waterman, Latham & Watkins LLP
Patrick O'Neill, HDR Engineering, Inc.

ATTACHMENT A

Tule Wind, LLC's Plan Amendment Authorization Request without exhibits (May 31, 2011)

IBERDROLA
RENEWABLES

May 31, 2011

Mr. Eric Gibson, Director
County of San Diego, Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: Tule Wind Project - Proposed Plan Amendment Authorization (PAA) and Proposed Amendment to the Zoning Ordinance

Dear Mr. Gibson:

Pursuant to San Diego County Board of Supervisors Policy No. I-63, Tule Wind, LLC, a wholly owned subsidiary of Iberdrola Renewables, Inc. (IRI), hereby applies for Plan Amendment Authorization (PAA) from you as the Director of the Department of Planning and Land Use (Department) to seek approval from the County Board of Supervisors for amendments to the County of San Diego Existing General Plan for the Tule Wind Project, which the Department is currently processing under Major Use Permit (MUP) application number 09-019. In addition, Tule Wind, LLC also applies for an amendment to the County of San Diego Zoning Ordinance for wind energy. Without initiation of these amendments, the Tule Wind Project cannot be approved by the County Board of Supervisors, and 201 megawatts (MW) of clean, renewable wind energy and associated economic benefits for the County will be lost.

Tule Wind, LLC is applying for authorization now because the County General Plan Update process is not expected to be completed prior to the point when the Board of Supervisors will be asked to consider the Tule Wind Project. Notably, if approved, the County General Plan Update currently under consideration by the Board of Supervisors would make both General Plan Amendment requests enclosed herein unnecessary because the Tule Wind Project is consistent with the County General Plan Update.[1] In fact, many observers, including Tule Wind, LLC, thought the County General Plan Update process would be completed by this point, which is also the reason why Tule Wind, LLC has not previously sought authorization to seek the General Plan Amendment requests herein.

Similarly, the Department's process for updating the County Zoning Ordinance for wind energy also is not expected to be completed prior to the point when the Board of Supervisors will be asked to consider the Tule Wind Project, although that process has also been on-going for some time.

[1] The sole exception to this statement concerns language in the Boulevard Subregional Plan, which would remove the Board's discretion to approve wind energy generation and is currently under review.

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The application proceeds as follows. Section I of this letter identifies the requested General Plan Amendments and why they are justified, and Section II identifies the requested amendments to the Zoning Ordinance for wind energy and why they are justified. Tule Wind, LLC also requests that the General Plan and Zoning Ordinance amendments be processed concurrently with its MUP application. All DPLU forms and supporting documentation associated with this PAA Application are presented under Attachment A.

Tule Wind, LLC requests that you exercise your discretion to process this PAA and to allow the Board of Supervisors the opportunity to consider the important renewable energy and economic benefits of the Tule Wind Project on the merits.

I. PROPOSED AMENDMENTS TO THE COUNTY GENERAL PLAN

A. Tule Wind Project Conflicts with the County General Plan

The underlying land use designations for the Tule Wind project area are not proposed to be amended under this PAA. Rather, the proposed General Plan amendments are limited to the applicable General Plan Policies listed below in Table 1, Plan Amendment Authorization Items, which include the proposed amendments to the County of San Diego General Plan Regional Land Use Element and Mountain Empire Subregional Plan.

Table 1 – Plan Amendment Authorization Items

Item	PAA Request	General Plan Land Use Designation	Tule Wind Project Facilities In Conflict
#1	Amend Policy (18) Multiple Rural Use of the Regional Land Use Element	(18) Multiple Rural Use 1 du/4,8,20 acres	2.2 mile segment of the electric transmission line
			Access roads
#2	Amend Policy / Recommendation 11 of the Mountain Empire Subregional Plan	(20) General Agriculture 1 du/10,40 acres	Seven (7) turbines[1] (R1, R2, and R7 through R11)
			Collector system
			Access roads
			1 laydown area
			0.85 mile segment of the electrical transmission line
		(18) Multiple Rural Use 1 du/4,8,20 acres	2.2 mile segment of the electrical transmission line
			Access roads (including the southern access road)

Source: County of San Diego General Plan
[1]Two turbines (R1 and R2) fall within the boundary of the Mountain Empire Subregional Plan / Boulevard Community Plan, while turbines R7 through R11 are not within the boundary of the Boulevard Subregional Planning Area.

Items #1 and #2 are further described below. The affected properties for each of the items below are presented in Attachment B, and illustrated in Attachment C.

1. Item #1: Tule Wind Project conflict with General Plan, Land Use Element Policy (18) Multiple Rural Use

The County of San Diego General Plan, Regional Land Use Element, sets a number of policies to guide development within the unincorporated area of the County. Regional Land Use Element Non-Urban Residential Designation Policy (18) Multiple Rural Use states, "it is not intended that any development occur unless the proposed development has been carefully examined to assure that there will be no

significant adverse environmental impacts, erosion and fire problems will be minimal, and no urban levels of service will be required." County Regional Land Use Element, Policy (18) Multiple Rural Use, pg. II-21.

A portion of the proposed electric transmission line and access roads for the Tule Wind Project are located on lands zoned General Rural (S92), and must comply with Policy (18) Multiple Rural Use. Because significant, adverse, immitigable impacts associated with the Tule Wind Project have been identified in the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) prepared by the California Public Utilities Commission (CPUC), Tule Wind, LLC requests your approval of a PAA to allow the Board of Supervisors to consider an amendment to Policy (18) Multiple Rural Use of the General Plan Regional Land Use Element for the affected parcels that are traversed by the proposed electric transmission line and access roadways for which Policy (18) Multiple Rural Use applies (see Attachment C, Item #1).

2. Item #2: Tule Wind Project conflict with Mountain Empire Subregional Plan Policy / Recommendation 11

The Mountain Empire Subregional Plan includes a number of "Policies and Recommendations" to implement the Industrial Goal. The Tule Wind Project's proposed facilities in the Mountain Empire Balance area and within the boundary of the Boulevard Community Planning Area are only subject to the Mountain Empire Subregional Plan because a land use document for the Boulevard Subregion has not been formally adopted.

Mountain Empire Subregional Plan Policy and Recommendation 11 states:

> Deny future industrial or commercial development which adversely impacts the Mountain Empire Subregional area, such as wind turbine generators, for any of the following reasons:
>
> a) Safety of the general public
>
> b) Unmitigated visual impact on the rural environment.
>
> c) Noise pollution emanating from the site exceeding 65 (decibels) dBs at the property line, as it creates great human discomfort and adversely affects the tranquility of the rural environment.
>
> d) Such development may lead to economic devaluation of contiguous properties.

Tule Wind, LLC maintains that the Tule Wind Project is consistent with Mountain Empire Subregional Plan Industrial Goal, Policy and Recommendation 11, because the project: (a) does not adversely impact the safety of the general public; (b) mitigates visual impacts, although it cannot mitigate them below a level of significance; (c) meets noise pollution standards; and (d) will not economically devalue contiguous properties.

In an excess of caution, however, Tule Wind, LLC requests your approval of a PAA to allow the Board of Supervisors to consider an amendment to Policy and Recommendation 11 of the Mountain Empire Subregional Plan for the affected parcels that are traversed by the proposed wind turbines, collector

system, electric transmission line, associated access roads, and laydown area to which Policy and Recommendation 11 applies (see Attachment C, Item #2).

B. Proposed Amendments to the General Plan

The proposed amendments for the Board of Supervisors' consideration to the County of San Diego General Plan that serve as the subject of this PAA Application are described below. Proposed amendments to the existing text of the General Plan are shown in underline text.

1. ***Item #1: Transmission Line and Access Road - Compliance with General Plan, Land Use Element Policy (18) Multiple Rural Use***

a. Proposal

Tule Wind, LLC requests a General Plan Amendment (GPA) that makes clear that Policy (18) Multiple Rural Use does not apply to the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects, as analyzed in the DEIR/DEIS prepared by the CPUC and BLM.

b. Proposed Language for General Plan, Land Use Element Policy (18) Multiple Rural Use

Other than a single-family home on an existing lot, it is not intended that any development occur unless the proposed development has been carefully examined to assure that there will be no significant adverse environmental impacts, erosion and fire problems will be minimal, and no urban levels of service will be required. Notwithstanding any provision of this paragraph to the contrary, a public improvement project may be approved when there are significant adverse environmental impacts if the County decision-maker adopts findings which demonstrate that the significant adverse environmental impacts have been mitigated to the greatest extent feasible and that the project is necessary to protect the public health and safety. This paragraph does not apply to Ordinance No. 10067, an amendment to the Zoning Ordinance related to the Small Winery, Wholesale Limited Winery and Boutique Winery use classifications, or to any uses allowed pursuant to this ordinance. This paragraph also does not apply to the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects, as analyzed in the Environmental Impact Report/Environmental Impact Statement (EIR/EIS), SCH No. 2009121079, DOI Control No. DES 10-62, certified by the California Public Utilities Commission on [DATE TO BE DETERMINED UPON CERTIFICATION] and approved by the United States Bureau of Land Management on [DATE TO BE DETERMINED UPON APPROVAL].

c. Rationale

The proposed language limits the scope of the PAA to only those areas analyzed for potential environmental impacts in the DEIR/DEIS. Furthermore, as noted above, this proposal is consistent with (and would be rendered moot by the adoption of) the Draft County General Plan Update currently under consideration by the Board of Supervisors.

2. ***Item #2: Wind Turbine Compliance with Mountain Empire Subregional Plan***

a. Proposal

Tule Wind, LLC requests a GPA that makes clear that Policy and Recommendation 11 does not apply to the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects, as analyzed in the DEIR/DEIS prepared by the CPUC and BLM.

b. Proposed Language for the Mountain Empire Subregional Plan, Policy and Recommendation 11

Deny future industrial or commercial development which adversely impacts the Mountain Empire Subregional area, such as wind turbine generators, for any of the following reasons:

a) Safety of the general public

b) Unmitigated visual impact on the rural environment.

c) Noise pollution emanating from the site exceeding 65 (decibels) dBs at the property line, as it creates great human discomfort and adversely affects the tranquility of the rural environment.

d) Such development may lead to economic devaluation of contiguous properties.

Policy and Recommendation 11 does not apply to the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie Projects, as analyzed in the Environmental Impact Report/Environmental Impact Statement (EIR/EIS), SCH No. 2009121079, DOI Control No. DES 10-62, certified by the California Public Utilities Commission on [DATE TO BE DETERMINED UPON CERTIFICATION] and approved by the United States Bureau of Land Management on [DATE TO BE DETERMINED UPON APPROVAL].

c. Rationale

The proposed language limits the scope of the PAA to only those areas analyzed for potential environmental impacts in the DEIR/DEIS. Furthermore, as noted above, this proposal is consistent with (and would be rendered moot by the adoption of) the Draft County General Plan Update currently under consideration by the Board of Supervisors.

II. PROPOSED AMENDMENTS TO COUNTY ZONING ORDINANCE § 6951

A. Tule Wind Project Conflicts with the County Zoning Ordinance

The Tule Wind Project is inconsistent with the setback and height requirements set forth in County Zoning Ordinance § 6951, which currently states:

a. Setbacks. The wind turbines shall observe the following setbacks measured from the closest point on the base or support structure. For purposes of calculating setbacks, height of the wind turbines shall mean the distance from ground to the top of blade in vertical position:

   1. From property lines or public road setback 4 times the height.
   2. From all existing residences or buildings occupied by civic use types setback 8 times the height.
   3. From the furthermost property line of adjacent parcels which are vacant setback 9 times the total height.
   4. Setbacks for experimental wind turbines (those which are not produced by an established wind turbine manufacturer on a production basis) may be greater than those specified above based on the discretion of the permit granting authority.
   5. Setbacks may be reduced up to a maximum of 50% with the written consent to the granting of a setback reduction signed by the owner or owners of each lot or parcel affected by the proposed setback reduction.

e. Height. For the purposes of calculating height, the height of the wind turbines shall mean the distance from ground to the top of the blade in vertical position. The system shall not exceed 80 feet.

These standards were put into place long before the development of the modern wind energy industry, and are in the process of being revised by the County.

Based on IRI's substantial wind energy operations throughout the United States and corresponding experience, IRI has determined that the appropriate setbacks for wind turbines should be 101% of the blade length from adjacent property lines of property owners who are participating in the project, and 131% of the turbine tip height from adjacent property lines of property owners who are not participating in the project or who have not otherwise provided consent when measured from center of turbine to property line. Furthermore, IRI has found that in certain situations, waivers from these setbacks may be appropriate and should be considered.

For the portions of the Tule Wind Project within the County's land use jurisdiction, the project can be designed to meet an even larger setback of four (4) times the turbine tip height from any existing residence, even though this is larger than the setback that IRI has found necessary. As mentioned previously, the project can also meet the standard of 131% of the turbine tip height for adjacent property lines of property owners who are not participating in the project or who have not otherwise provided consent.

Specific features of the Tule Wind Project and the project site make it appropriate for the County to adopt specific setback and height standards that differ from County Zoning Ordinance § 6951.

B. Proposed Amendments to County Zoning Ordinance § 6951

a. Proposal

Tule Wind, LLC requests an amendment to County Zoning Ordinance § 6951 that provides specific height and setback limitations for the Tule Wind Project. Proposed amendments to the existing text of the County Zoning Ordinance § 6951 are shown in underline text.

b. Proposed Language for County Zoning Ordinance Section 6951

a. Setbacks. The wind turbines shall observe the following setbacks measured from the closest point on the base or support structure. For purposes of calculating setbacks, height of the wind turbines shall mean the distance from ground to the top of blade in vertical position:

1. From property lines or public road setback 4 times the height.
2. From all existing residences or buildings occupied by civic use types setback 8 times the height.
3. From the furthermost property line of adjacent parcels which are vacant setback 9 times the total height.
4. Setbacks for experimental wind turbines (those which are not produced by an established wind turbine manufacturer on a production basis) may be greater than those specified above based on the discretion of the permit granting authority.
5. Setbacks may be reduced up to a maximum of 50% with the written consent to the granting of a setback reduction signed by the owner or owners of each lot or parcel affected by the proposed setback reduction.
6. Instead of the setbacks listed in subsections 1, 2, 3 and 5 above, setbacks for wind turbines located on land subject to County land use jurisdiction provided for in the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie PROJECT, as analyzed in the Environmental Impact Report/Environmental Impact Statement (EIR/EIS), SCH No. 2009121079, DOI Control No. DES 10-62, certified by the California Public Utilities Commission on [DATE TO BE DETERMINED UPON CERTIFICATION] and approved by the United States Bureau of Land Management on [DATE TO BE DETERMINED UPON APPROVAL], shall comply with the following replacement setback requirements:

   (a) four (4) times turbine tip height from any existing residence or buildings occupied by civic use types, when measured from center of turbine to residence or building occupied by civic use type; and

(b) 101% of the blade length from any adjacent property line of a property owner that is participating in the project analyzed in the EIR/EIS, when measured from center of turbine to property line; unless either (i) written consent signed by the owner(s) of each lot or parcel affected by the proposed setback reduction is obtained or (ii) the lot or parcel affected by the proposed setback is owned by the Bureau of Land Management or other state or federal agency that participated in the preparation of such EIR/EIS; and

(c) 131% of the turbine tip height from any adjacent property line of a property owner that is not participating in the project analyzed in the EIR/EIS, when measured from center of turbine to property line; unless either (i) written consent signed by the owner(s) of each lot or parcel affected by the proposed setback reduction is obtained or (ii) the lot or parcel affected by the proposed setback is owned by the Bureau of Land Management or other state or federal agency that participated in the preparation of such EIR/EIS; and

(d) 131% of the turbine tip height to edge of public road right-of-way when measured from center of turbine; and

(e) 101% of turbine tip height to edge of transmission line easement or right-of-way when measured from center of turbine.

7. Wind turbines located on land outside of the County's land use jurisdiction are not required to comply with this ordinance.

* * *

e. Height. For the purposes of calculating height, the height of the wind turbines shall mean the distance from ground to the top of the blade in vertical position (turbine tip height). The system shall not exceed 80 feet, except any wind turbine located on land subject to the County's land use jurisdiction provided for in the East County Substation, Tule Wind, and Energia Sierra Juarez Gen-Tie PROJECT, as analyzed in the Environmental Impact Report/Environmental Impact Statement (EIR/EIS), SCH No. 2009121079, DOI Control No. DES 10-62, certified by the California Public Utilities Commission on [DATE TO BE DETERMINED UPON CERTIFICATION] and approved by the United States Bureau of Land Management on [DATE TO BE DETERMINED UPON APPROVAL], shall be permitted to exceed 80 feet so long as the Federal Aviation Administration has issued a Determination of No Hazard for the turbine.

c. Rationale

The requested language is appropriate because it limits the scope of the zoning ordinance amendment to the projects whose environmental impacts have already been studied in the DEIR/DEIS. It establishes appropriate setbacks for adjacent property owners that are both participating in and not participating in the Tule Wind Project based on IRI's extensive experience operating modern wind turbines. Finally, the proposed language is appropriate because the specific features of the Tule Wind Project and the project site make it appropriate for the County to adopt specific standards for the project area, which differ from the existing County-wide ordinance.

III. CONCLUSION

Tule Wind, LLC appreciates your consideration of its Plan Amendment Authorization, and requests that you exercise your discretion to process it in order to allow the Board of Supervisors the opportunity to consider the important renewable energy and economic benefits of the Tule Wind Project on the merits. Please let us know if we can provide further information to you.

Sincerely,

Jeffrey Durocher
Senior Permitting Manager

Attachments: Attachment A – DPLU Forms and Supporting Documents (5 copies each)

1. Acknowledgement of Filing Fee and Deposit (DPLU #126) – Property Owner Permission Letters pending
2. PAA Application (DPLU #271)
3. Ownership Disclosure Forms (DPLU #305)
4. Discretionary Permit Application (DPLU #346)

Attachment B – PAA Affected Parcels

1. Item #1 - Affected Parcels subject to Regional Land Use Element Policy (18) Multiple Rural Use
2. Item #2 – Affected Parcels subject to Mountain Empire Subregional Plan Policy/Recommendation #11

Attachment C – Figures

1. Item #1 - Proposed Amendment to Policy (18) Multiple Rural Use
2. Item #2 - Proposed Amendment to Mountain Empire Subregional Plan Policy/Recommendation #11
3. USGS Topographic Map

Enclosures: PAA Application Filing Fee - $1,460

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APPENDIX B

Full Project Description for the Tule Wind Project

1.0 Location and Introduction

The Tule Wind Project (proposed project) is proposed to be located in the eastern portion of San Diego County, approximately 50 miles east of the City of San Diego, 90 miles west of Arizona, and is north of the community of Boulevard. The area is accessible via Interstate 8 (I-8), State Route 94 (SR-94) and Ribbonwood Road junction, and McCain Valley Road off of Old Highway 80.

The Tule Wind Project is located primarily on federal lands managed by the Bureau of Land Management (BLM). Portions of the project are also on lands owned by the Ewiiaapaayp Reservation, Campo and Manzanita Reservations (access only), the California State Lands Commission (CSLC), and privately-owned parcels under the jurisdiction of the County of San Diego. The majority of the overall project area is outside the land use jurisdiction of the County of San Diego; however, certain project-related components and activities are proposed on privately owned lands to support the project. Therefore, project-related components and activities proposed within the County's jurisdiction, and identified within this Major Use Permit (MUP), are subject to the guidelines, thresholds, ordinances, and standards of the County of San Diego, respectively.

Major Use Permit Project Area

The MUP Project Area encompasses a portion of the overall 20 project area parcels where facilities are proposed as part of the Tule Wind Project MUP. The proposed project is comprised of both on-site and off-site project components and activities. As shown in **Table 1** and **Figure 1**, seven of the overall 20 MUP project area parcels would solely be affected by the construction of the off-site 138 kV transmission line, and one of the MUP project area parcels is included for temporary construction access to the parking lot on BLM land. In total, 20 privately-owned parcels are included within MUP 09-019, with an anticipated temporary disturbance area of approximately 87.3 acres, and a permanent disturbance area of 21.4 acres[1].

Table 1. Major Use Permit Project Area Parcels

APN	Owner	Project Component or Activity[1]
Private Parcels Affected by On-Site Project Features		
529-110-01	Harmony Grove Partners L P	No impact anticipated (potential mitigation area)
529-140-01	Harmony Grove Partners L P	2 Turbines (R-7 and R-8), Proposed New Roads (RC and RF), and Underground Collector
529-150-01	Harmony Grove Partners L P	3 Turbines (R-9, R-10, and R-11), Proposed New Road (RF), Underground Collector, and 2-acre Temporary Laydown (staging) Area
611-030-01	Harmony Grove Partners L P	Temporary Batch Plant, Project Collector Substation, Operations & Maintenance (O&M) Building, Proposed New Roads (BP, OM), McCain Valley Road configuration, and "Preferred" 138 kV Transmission Line
611-060-04	Vista Oaks Business Park L P	Temporary Access Road (PK) for access to parking lot during construction
611-070-01	Harmony Grove Partners L P	2 Turbines (R-1 and R-2), Proposed New Roads (GB, G2), and Underground Collector
611-090-02	Vista Oaks Business Park L P	Proposed New Road (EW) and Temporary Access Road (PK) for access to parking lot during construction
611-090-04	Vista Oaks Business Park L P	Proposed New Road (EW), Construction Well #6-6a
611-090-15	Garber Jeffrey M & Peggy A	Proposed New Road (EW)

[1] See Sheet 2 of 21 of the Tule Wind Project Plot Plan

611-091-09	Vista Oaks Business Park L P	Proposed New Road (EW)
611-100-01	Harmony Grove Partners L P	Proposed New Road (EW)
611-100-02	Harmony Grove Partners L P	Proposed New Road (EW)
611-110-01[2]	Waterstone Support Foundation	Construction Well #8, "Preferred" 138 kV Transmission Line
Private Parcels Affected by Off-Site Gen-Tie Line		
612-091-12	Horner Stephen & Catherine	"Preferred" 138 kV Transmission Line
612-091-13	Lansing Industries Inc	"Preferred" 138 kV Transmission Line
612-092-13	SDG&E	"Preferred" 138 kV Transmission Line Interconnect with Boulevard Sub
613-010-14	Wuest Estate Co	"Preferred" 138 kV Transmission Line
613-010-15	Wuest Estate Co	"Preferred" 138 kV Transmission Line
613-010-16	Wuest Estate Co	"Preferred" 138 kV Transmission Line
613-030-28	Lansing Industries Inc	"Preferred" 138 kV Transmission Line

[1] Project components and activities are described in detail below under Section 3, Project Description.
[2] Property included in the on-site MUP Project Area for groundwater extraction purposes

Many alternative scenarios were considered and evaluated by the California Public Utilities Commission (CPUC) during preparation of the EIR/EIS. Since the environmental analysis began, a portion of the Rough Acres Ranch property where the co-located substation and O&M facility was previously proposed, and access thereto, has been leased to and occupied by SDG&E; making this location no longer feasible. For this reason, the project collector substation and O&M facility are proposed to be relocated from the southern portion of Rough Acres Ranch (APN: 611-070-01) identified as part of Alternative 2 (DEIR/DEIS) to a different Rough Acres Ranch parcel (APN: 611-030-01) that is available for use by Tule Wind LLC during project construction and operation. A supplemental environmental analysis for the relocation of the project collector substation and O&M facility from APN: 611-070-01 to APN: 611-030-01 is included as part of this MUP submittal.

The alternate alignment for the 138 kV transmission line within the McCain Valley Road right-of-way (ROW) is also included within this MUP, as this alternative scenario was identified by County staff as a potential feasible option to place the proposed transmission line. Due to the fact this alternate scenario was not included in the EIR/EIS for the Tule Wind Project, a supplemental environmental analysis of the 138 kV transmission line within the McCain Valley Road ROW is provided as part of this MUP submittal if this alternate transmission line route were to be selected for construction.

2.0 Proposed Use Type

The proposed project (inclusive of turbines and associated components) is considered to be a Civic Use Type – Major Impact Services and Utility per Section 1350 of the County of San Diego Zoning Ordinance. The use can be further described as follows:

> Major Impact Services and Utilities - The Major Impact Services and Utilities use type refers to public services and utilities which have substantial impact. Such uses may be conditionally permitted in any zone when the public interest supersedes the usual limitations placed on land use and transcends the usual restraints of zoning for reasons of necessary location and community wide interest. Section 6951 of the County Zoning Ordinance provides direction for the development of large wind turbine systems.

The proposed project will require water for construction purposes (i.e., road construction, tower foundation construction, and dust suppression), and for the operation of the project. Depending on

the size of the turbine (1.5 MW to 3.0 MW), the project is anticipated to use a peak volume of up to approximately 250,000 gallons per day when (1) Road Construction (approximately 120,000 gallons per day) overlaps with (2) Turbine Foundation Concrete Mixing (15,000 -30,000 gallons per day) and (3) associated Dust Suppression (approximately 100,000 gallons per day) is occurring simultaneously. Because the project water demand exceeds 20,000 gallons per day, the project is considered a water intensive use; and therefore, the extraction of groundwater is considered an Extractive Use Type - Groundwater Extraction Operation per Section 1800 of the County of San Diego Zoning Ordinance. The use can be further described as follows:

> Groundwater Extraction Operation - Any property containing a well, spring box or other device through which groundwater is collected or extracted for sale. Groundwater Extraction Operations includes all appurtenant structures and facilities associated with the collection, extraction, storage, transfer and transportation of the groundwater, whether or not such appurtenant structures and facilities are located on the same legal lot as that from which the groundwater is collected or extracted. Section 6550 of the County Zoning Ordinance and the County of San Diego Groundwater Ordinance provides direction for groundwater extraction.

3.0 Project Description

The Tule Wind Project (in its entirety) will consist of wind turbines, an overhead and underground electrical collection system and 138 kV transmission line, a project collector substation, an O&M facility, transportation haul routes and access roads, temporary concrete batch plants, a parking area, laydown (staging) areas, and meteorological towers.

A description of project components and activities for the portions of the project within the County of San Diego jurisdiction is provided as follows.

On-Site Project Components and Activities

The on-site project components and activities (including alternates) would include the following:

- Up to 7 large-scale wind turbines (in the 1.5 to 3-MW range) and associated generator step-up transformers;
- Portions of the 34.5-kilovolt (kV) underground collector cable system linking the turbines together;
- Improvements to existing private roads and the construction of new access roads;
- Up to three construction wells (One well to remain throughout operation);
- One temporary laydown area;
- One temporary batch plant;
- One O&M facility;
- One septic system (O&M facility);
- One project collector substation; and

- Extraction of approximately 16 to 18.9 million gallons (49 to 58 acre-feet) of water over the course of the construction, and an estimated 2,500 gallons per day (2 acre-feet per year) for ongoing operations.

Off-Site Project Components and Activities

Off-site project components and activities are considered to be connected actions that will be necessary for the operation of the proposed project. Off-site project components and activities include the following:

- Construction of a 138 kV transmission line and associated transmission towers proposed to run south from the project collector substation to interconnect with the SDG&E proposed Rebuilt Boulevard Substation; and
- Improvements to existing County maintained roads including Ribbonwood Road and McCain Valley Road to accommodate equipment delivery.

4.0 Project Components

On-Site Project Components

Wind Turbines

The proposed project includes the construction and operation of up to 7 wind turbines under County jurisdiction, ranging in output from 1.5 to 3.0 MW. **Table 2** presents the number of turbines proposed on private properties as part of the Tule Wind Project.

Table 2. Turbine Locations

Assessor Parcel Number	Number of Turbines and Turbine ID
529-140-01	2 (R-7 and R-8)
529-150-01	3 (R-9, R-10 and R-11)
611-070-01	2 (R-1 and R-2)

The turbine manufacturer has not yet been determined. Each turbine will be three bladed, with an upwind horizontal-axis, with a rotor diameter of up to 328 feet. Each turbine will be a maximum of 492 feet tall, as measured from the ground to the turbine blade tip, and will be mounted on a concrete pedestal, supported by a permanent concrete foundation. Each turbine will have a turbine rotor and nacelle mounted on top of its tubular tower, for a rotor hub height of up to 328 feet. All of the turbine components (towers, nacelles, and rotors) will be painted or finished using low-reflectivity, neutral white colors in conformance with Federal Aviation Administration (FAA) rules. Turbine and transmission towers will be tubular rather than lattice design to eliminate bird perching and nesting opportunities provided by lattice structures. Computer systems inside each turbine would perform self-diagnostic tests and allow a remote operator to set new operating parameters, perform system checks, and to ensure turbines are operating at peak performance. Turbines would automatically shut down if sustained winds or gusts exceed predetermined set points established by the turbine manufacturer to prevent equipment failure.

Each turbine work area will require up to a 200-foot radius to be cleared and graded depending on the site topography. The 200-foot radius would allow flexibility in the design of the final turbine layout, in case a turbine needs to be relocated based upon site conditions. Each turbine will be mounted on a concrete pedestal, supported by a permanent wind tower foundation measuring approximately 40 to 80 feet in diameter, and 7 to 10 feet in depth, and is estimated to use approximately 275 to 707 cubic yards of concrete (depending on the final size of the turbines used). A geotechnical engineer will determine the specifications regarding foundation strength and location as determined by soil testing. Other design factors will be determined by the suitability of soils and geology content. Upon completion of construction, with the exception of an area 40 to 80 feet in diameter (gravel up to a 10-foot radius to provide surface stabilization), the 200-foot cleared area would be revegetated with fire safe noncombustible, low fuel vegetation, in a spacing and height configuration consistent with fire agency standard practices for a distance necessary to provide a minimum of 100 feet of fuel management from the turbine base and/or transformer.

Wind turbine technology continues to improve, and the cost and availability of turbine types can change from year to year; therefore a specific turbine has not been selected at this time. The Plot Plan illustrates the project layout using 1.5 MW GE turbines to show the maximum number of turbines that could be installed (7). If 3.0 MW turbines were selected, half as many turbines would be needed to produce 201 MW for the entire project. Wind turbines of different sizes require different spacing between and within rows depending on the specific turbine chosen. All environmental studies and surveys have been conducted using the worst case scenario for turbine type; for example, the most turbines were used to determine disturbed areas, the tallest turbine was used for visual analysis, and the turbines generating the highest noise levels were used for noise assessment.

Preliminary diagrams of the typical turbine site and turbine tower design are shown in **Figures 2 and 3**.

Underground Collector System

The underground collector system will collect electricity generated at 600-690 volts from each wind turbine, increase the voltage to 34.5 kV through a transformer located on a pad at the base of each turbine or within the wind turbine itself, and deliver it to the project collector substation. The underground collector system will consist of a network of 34.5 kV circuits that will collect power and energy from the wind turbine generators and deliver it to the project collector substation. Each circuit will consist of three 35 kV cables with sizes that will vary with the designed electrical load. All cables will have stranded aluminum conductors, cross-linked polyethylene insulation, and a copper concentric shield neutral ground wire in black polyethylene jacket. Each circuit will also have a bare copper or copper-clad trench neutral ground wire. Each circuit will typically include a fiber optic cable for wind turbine generator management and control. The three cables that comprise each circuit are placed in the trench in a tight trefoil configuration and backfilled with select soil from the trench excavation. Trenches will measure 44 to 50 inches in depth with a width of 12 inches. No conduits will be used for power cables, except for riser poles. Additionally, concrete or fiberglass vaults and splice boxes will be placed at necessary locations, with locked lids to prevent public access. The vaults will be approximately 5x5x8 feet, and will be placed approximately 2,500 feet apart.

The select backfill will be free of rocks and debris, and each 3-phase cable trench will be separated from all other cable trenches by a minimum of 10 feet, 6 inches. The remainder of the trench will be backfilled with excavated soil in 12-inch lifts and compacted to near original density. The 34.5 kV underground collector system will require a 24-foot wide temporary disturbance area. A typical trench cross section drawing is shown in **Figure 4**, Below Ground Collector Line.

The electrical collector system is proposed to be underground. However, where site-specific considerations (such as steep canyon crossings, soil conditions not conducive to underground collector construction or to avoid wetlands or other sensitive features) require, the collector system may need to be placed aboveground. Aboveground collector lines will use wood or steel poles that are 60 to 80 feet in height; taller heights may be needed to cross washes or drainages. A typical overhead 34.5 kV single circuit collector line is presented in **Figure 5** and a typical 34.5 kV double circuit collector line is presented in **Figure 6**.

Collection and transmission line distribution, spacing, and cleared areas will comply with industry standards and safety measures to avoid environmental and cultural resources in compliance with CEQA and NEPA. The electrical collection and distribution system will be in compliance with Rule 250 of the National Electric Safety Code (NESC), and the electrical design standards of the National Electric Code (NEC) for inside/outside low voltage and high voltage applications.

Roads

Existing roadway upgrades and new access roadways will be required to accommodate large construction trucks delivering equipment to the project area. Roadway improvements will include widening existing roads from 16- to 20-foot widths to 36-foot widths to accommodate large cranes and equipment delivery. **Figures 7 and 8** show the Typical Access Road Cross Sections.

Upon completion of construction activities, existing and proposed access roads located on land under the jurisdiction of the County of San Diego will be improved to comply with the Department of Public Works Private Road Standard of 24 feet (28 foot graded extent).[2] Spur roads to all turbines will be improved to a maximum of 18 feet wide to comply with State Responsibility Area (SRA) Fire Safe Regulations.

Due to the low overpass of I-8 over McCain Valley Road, the primary access for large trucks to the project area during construction will be from Ribbonwood Road, with other smaller vehicles utilizing McCain Valley Road. A new roadway to provide east/west access from Ribbonwood Road to McCain Valley Road is proposed as part of the project. Tule Wind LLC is pursuing easements, as necessary with land owners in the area for the new roadway connecting Ribbonwood Road to McCain Valley Road.

Any new access roads will follow natural contours and minimize side hill cuts to the extent possible. New roads will be designed to maintain current surface water runoff patterns to prevent erosion. Soil erosion will be controlled at culvert outlets and catch basins; and roadway ditches and culverts will be maintained and cleaned on a regular basis. Roads will be located away from drainages and wetlands where possible to avoid or minimize impacts to these resources.

Groundwater Extraction

Water will be required during the construction phase of the project and throughout operations. During construction, water will be used for road construction, turbine foundations, and dust suppression. Throughout operation, water will be required for the O&M building. Groundwater is proposed to be extracted from up to three wells located on Rough Acres Ranch on the following private properties, as shown in **Table 3**.

[2] The main project roads (Ribbonwood Road and McCain Valley Road) throughout the project site will be improved to a maximum of 20 feet to comply with the California Fire Code Standards on lands outside of the County's jurisdiction.

Table 3. Groundwater Well Locations

Assessor Parcel Number	Number of Groundwater Wells
611-090-04	2 (Construction Well #6-6a)
611-110-01	1 (Construction Well #8)

Results of the groundwater investigation conservatively indicate that combined groundwater from the tested Rough Acres Ranch Wells No. 6 and 6a can support sustained pumping at 100 gpm; Rough Acres Ranch Well No. 8 can support sustained pumping of 18 gpm; and the tested Ewiiaapaayp Reservation North well can also support sustained pumping of 18 gpm. Together these wells could provide a peak groundwater volume of up to 136 gpm and total groundwater supply of up to 164 acre-feet, exceeding the estimated project peak groundwater demand of 117 to 124 gpm and total groundwater demand of 58 acre-feet.[3] Ongoing operations would require only a limited quantity of water; estimated at 2,500 gallons per day to supply the operations and maintenance building services and support staff.

The *Revised Groundwater Investigation Report* (October 2011) outlines the backup assumptions behind every construction phase's groundwater demand, and provides an evaluation of peak groundwater demand periods for the project. The Tule Wind Project's estimated total construction water demand will be adequately served by the on-site wells identified in Table 3 above.

See Section 5.0, Construction of Facilities, for more information relative to construction water usage and water availability for the project needs.

Laydown and Parking Areas

Turbine construction activities will require utilization of a temporary 2-acre laydown (staging) area, generally located between proposed Turbines R-9 and R-10. During construction, the staging areas may be fenced and gated to control access and limit damage or theft of stockpiled material and equipment. The staging areas may be graveled depending upon site soils conditions.

The laydown areas will be removed upon completion of construction and revegetated to its natural state in accordance with the Conceptual Mitigation Plan and Revegetation Plan prepared for the Tule Wind Project (see Appendix J of this MUP submittal).

Cement Batch Plant

During construction, a temporary 5-acre concrete batch plant is proposed on Rough Acres Ranch (APN: 611-030-01), just off of McCain Valley Road. The batch plant is necessary to mix concrete for the foundations of the turbine towers, collector substation, and the O&M facility. Sand, aggregate, and concrete could be sourced from existing local and permitted quarries. After being delivered to the batch plant, the aggregate and sand would be placed into stockpiles. Cement, obtained from offsite vendors, could also be delivered by truck and stored in silos. Approximate quantities for raw materials necessary for each proposed turbine would include 350,000 to 700,000 pounds of sand; 475,000 to 950,000 pounds of aggregate; and 200,000 to 400,000 pounds of cement.

[3] See the *Revised Groundwater Investigation Report* (October 2011) located in Appendix I of this MUP submittal.

The batch plant would consist of a mixing plant, areas for aggregate and sand stockpiles, driveways, truck load-out area, and turnaround. The batch plant would include cement storage silos, water and mixture tanks, aggregate hoppers, and conveyors and augers to deliver different materials to the mixing plant. The batch plant equipment is portable and would be removed once construction is complete and the site would be recontoured and revegetated to its natural state in accordance with the Conceptual Mitigation Plan and Revegetation Plan prepared for the Tule Wind Project (see Appendix J of this MUP submittal).

Operation and Maintenance Facility

The O&M facility is proposed on Rough Acres Ranch property (APN: 611-030-01), south of the proposed temporary batch plant and project collector substation. The O&M building will be an approximately 5,000 square foot pre-engineered one-story metal building located and surrounded by a fenced and cleared area. The O&M building will house operational services and critical spare parts. The O&M building will include a foundation, with electrical and heating, ventilation, and air conditioning (HVAC) systems. The O&M building will also include a septic system and groundwater well to provide up to 5 gallons per minute of potable water. Once the project is operational, the O&M building is estimated to use approximately 2,500 gallons per day of water. A typical O&M Building site and design are shown in **Figures 9 and 10**.

Project Collector Substation

The Project Collector Substation is proposed on Rough Acres Ranch (APN: 611-030-01), north of the proposed temporary batch plant and O&M facility. The collector substation will include an approximate 3-acre graveled, fenced area with transformer and switching equipment, with a parking area for utility vehicles.

The substation equipment will have two (138 kV and 34.5 kV) 100 megavolt ampere (MVA) power transformers that are connected through 138 kV circuit breakers to a common 138 kV transmission line within the substation. The low side of each transformer is connected through a 34.5 kV circuit breaker to a split 34.5 kV bus. Each side of the 34.5 kV bus will have up to eight feeder positions, with each feeder protected with a circuit breaker. At this time, it is anticipated that all 138 kV and 34.5 kV equipment will be the outdoor type. A Typical 200 MW Collection Substation Plan View is shown in **Figure 11**, and a Typical 200 MW Collection Substation One-Line Diagram is shown in **Figure 12**.

Off-Site Project Components and Activities

138 kV Transmission Line

The overhead 138 kV transmission line will begin at the project collector substation on APN: 611-030-01 and run south on the east side of McCain Valley Road or within the road ROW, across I-8 to the SDG&E proposed Rebuilt Boulevard Substation located on Old Highway 80. The 138 kV transmission line will be constructed as either a single circuit or double circuit transmission line, as shown **Figure 13a** and **Figure 13b**. The "preferred" alignment traverses BLM and private lands, and generally runs along the alignment of SDG&E's Sunrise Powerlink (500 kV transmission line), just east of McCain Valley Road. Alternatively, Tule Wind LLC is also considering constructing the 138 kV transmission line within the McCain Valley Road ROW. If the 138 kV transmission line were to be constructed within the McCain Valley Road ROW (under this alternate scenario), an encroachment permit from the County of San Diego Department of Public Works (DPW) will be required. Both transmission line alignments are shown in the Plot and Grading Plans and described herein for the purposes of this MUP.

Steel galvanized or weathered steel finish transmission poles will be necessary to support the 138 kV transmission line. The proposed transmission line and poles will be within a 125-foot ROW easement. The typical steel galvanized or weathered steel finish poles supporting the transmission line will be approximately 74.5 feet in height, with typical span length of 600 feet and a maximum length of 700 feet. A cable pole and underground cable will also be required to connect the 138 kV transmission line to the SDG&E proposed Rebuilt Boulevard Substation. The cable pole may be an additional 40 feet higher than the typical steel pole presented in **Figure 13a** and **13b**.

Conductors

The 138 kV transmission line will have three conductors supported by insulators on single-shaft steel poles that will either be galvanized or coated with a weathered steel finish to resemble wood. The use of a non-specular finish is not planned. This is a standard industry conductor identified as "Pheasant." The minimum engineering specifications for ground clearance is 30 feet under final sag and a conductor temperature of 212ºF. Vertical clearance between conductors will be 12 feet and horizontal clearance will exceed 12 feet. This spacing is determined by conductor movement envelopes at mid span, and the clearance required that would avoid unintended electric arcing or "flashover." The CPUC General Order (G.O.) 95 clearance requirements will be applied to the design at highways and other special crossings.

It is anticipated that the average span length between transmission line poles will be 600 feet, and that the maximum span length will be 700 feet. The poles will support a fiber optic shield wire at the pole top. This cable will shield the 138 kV conductors from lightning strikes while carrying communication lines. The lines will be designed to conform to the standards of the Edison Electric Institute's Avian Powerline Interaction Committee (APLIC 2006).

5.0 Construction of Facilities

Field surveys will be ongoing throughout the design phase as final engineering takes place to ensure all construction areas have been appropriately surveyed prior to commencing construction activities. All construction activities will be conducted within the authorized limits of the final Plot Plan, as approved by the County of San Diego.

Project construction will involve the following tasks:

- Constructing access roads and parking areas;
- Conducting ongoing dust and erosion control;
- Excavating for turbine, transformer, and other foundations;
- Leveling areas for setting the erection crane;
- Pouring foundations for the wind turbines;
- Transporting tower sections to the site and erecting the towers;
- Installing the nacelle and rotor on the wind turbine tower;
- Trenching for underground utilities and 34.5 kV collection system power cables;
- Commissioning and testing the wind turbines; and
- Conducting final road grading, final erosion control, and site cleanup.

Table 4 shows a list of typical equipment used for wind facility construction.

Table 4. Typical Construction Equipment

Equipment	Use
Bulldozer	Road and pad construction
Grader	Road and pad construction
Water trucks	Compaction, erosion and dust control
Roller/compactor	Road and pad compaction
Backhoe/trenching machine	Digging trenches for underground utilities
Excavator	Foundation excavation
Heavy duty rock trencher	Underground trenching
Truck-mounted drilling rig	Drilling power pole holes
Concrete trucks/concrete pumps	Pouring tower and other structure foundations
Cranes	Tower/turbine erection
Dump trucks	Hauling road and pad material
Flatbed & Low-bed trucks	Hauling turbine towers, turbines and components, construction equipment
Pickup trucks	General use and hauling of minor equipment
Small hydraulic cranes/forklifts	Loading and unloading equipment
Four-wheel-drive all-terrain vehicles	Rough grade access and underground cable installation
Rough-terrain cranes / forklifts	Lifting equipment and pre-erection assembly

Construction Schedule

It is anticipated that the construction phase of the project will begin as early as December 2011 and continue for 24 months. **Table 5** provides the Proposed Construction Schedule.

Table 5. Estimated Construction Schedule

Project Activity	Start Dates
BLM Record of Decision adopted and effective	First Quarter 2012
Acquisition of additional required permits	First Quarter 2012
Right-of-way / property acquisition	First Quarter 2012
Construction begins	Second Quarter 2012
Completion of construction	Fourth Quarter 2013
Project operational	November 2013
Punch List/Clean up	January 2014

Construction Access

The primary route of access into the construction area would be off of U.S. Interstate-8 using the 94 Campo/Boulevard (Exit 65) off ramp. The proposed access route linking Ribbonwood Road to McCain Valley Road will be the primary haul route for delivery vehicles with large equipment accessing Rough Acres Ranch and the northern portion of the project on BLM lands throughout McCain Valley. McCain

Valley Road (via Old Highway 80) would also be used for smaller construction vehicles during construction activities and by O&M staff once construction is complete. During construction, the western portion of the project area could also be accessed by Crestwood Road to provide additional access over tribal and state-owned lands located on the northwestern ridge of the Tule Wind Project area. The applicant will consult with the County Department of Planning and Land Use (DPLU) and DPW regarding roadway detours, temporary closures, and traffic delays during the construction phase. A Traffic Control Plan will be prepared for the project and submitted to the County DPW prior to commencing construction.

Clearing and Grading

Project construction activities will avoid excessive grading on roads, road embankments, ditches and drainages to the extent possible. Roads will be located away from drainage bottoms and wetlands, if practicable, and will be designed to minimize surface water runoff and erosion. Areas with erodible soils will be avoided to the extent practicable. The construction workforce will be trained to identify and avoid any sensitive areas that have been excluded from the construction work areas. Special efforts will be made to flag sensitive areas, and to minimize the potential for accidental disturbance from construction equipment and crews.

Some areas may require blasting for turbine foundation excavation, to obtain the required roadway profiles and to install power poles and underground collector cables. The construction contractor will follow all blasting procedures identified by applicable federal, state, and local regulations.

Foundation Construction and Tower Erection

A temporary construction work area will be cleared for each wind turbine tower. Work areas may vary in size, and may be constructed differently in keeping with each site's topography. Each turbine work area will require up to a 200-foot radius to be cleared and leveled. The cleared area is necessary for foundation excavation and construction, assembling turbine sections, and to stage the construction crane which will hoist turbine sections into place. The turbine construction area will not be paved.

To support the construction crane for turbine erection, a compacted-soil crane pad measuring 40 feet by 120 feet with a maximum slope of 1.0 percent is required. The construction crane pad will not have an asphalt surface, and underlying soils will be compacted to provide a soil bearing capacity designed to provide a stable foundation for the crane. In locations where this is not feasible, a different type of crane mat will be used to stabilize the crane. The turbine foundation design will be based on site-specific geotechnical investigations. Prior to identifying a final site layout, soil borings will be collected for each wind tower site to assure sufficient soil bearing capacity necessary to provide a stable foundation for the crane. A licensed geotechnical engineer will then analyze and recommend specific construction techniques for foundational strength at each tower. Reinforced concrete foundations will be placed according to the manufacturer's and geotechnical engineer's recommendations.

Permanent wind tower foundations will be buried underground and will be approximately 40 to 80 feet in diameter, with a depth of 7 to10 feet. Exact dimensions will depend on specific site needs and the wind turbine selected. After turbine erection has been completed, with the exception of an area 40 to 80 feet in diameter (gravel up to a 10-foot radius to provide surface stabilization), the 200-foot cleared area would be revegetated with fire safe noncombustible, low fuel vegetation, in a spacing and height configuration consistent with fire agency standard practices for a distance necessary to provide a minimum of 100 feet of fuel management from the turbine base and/or transformer. The gravel will provide a stable surface area for maintenance vehicles, and will minimize surface erosion and runoff.

Construction of Underground and Overhead Power Collection Lines

Underground electrical and communications cables will be placed in a 44- to 50-inch-deep and 12-inch-wide trench. Electrical cables will be installed first and the trench will be partially backfilled before placing communications cables. The topsoil in the trench will be stripped and set aside before the trench is backfilled, with topsoil replaced on the uppermost layer.

In rocky areas, blasting may be necessary to loosen rock before the trench is excavated. Explosives will only be used within specified times and at specified distances when the work is in the area of sensitive wildlife habitats. All areas temporarily disturbed during trenching for underground lines will be reseeded with native species.

Concrete or fiberglass vaults and splice boxes will be placed at necessary locations. Boxes will have locked lids to prevent public access. The vaults will be approximately 5x5x8 feet, and will be placed approximately 2,500 feet apart.

Aboveground collector lines will use steel poles that are 60 to 80 feet in height; taller heights may be needed to cross washes or drainages. Aboveground lines are normally used to span canyons or streams to eliminate the habitat disturbance that trenching causes in these areas. Specific conditions that make it advantageous to run segments of the electrical system aboveground include:

- Steep terrain, where the use of backhoes and trenching machines is infeasible or unsafe;
- Stream and wetland crossings, where an aboveground line can avoid or minimize environmental impacts;
- Presence of soils with low thermal conductivity (preventing adequate heat dissipation from the conductor); and
- Rocky conditions that increase the need for blasting and significantly increase trenching costs.

Geotechnical studies will be conducted after the CEQA and NEPA process is completed, when an agency approved project design is available to determine where aboveground collector cables will be necessary. The applicant will design all aboveground collector line support structures in keeping with the applicant's Avian and Bat Protection Plan developed with the U.S. Fish and Wildlife Service (USFWS), as well as the Edison Electric Institute's Avian Powerline Interaction Committee (APLIC 2006). The applicant will also install anti-perching devices on collector line poles where poles are within 0.5 mile of turbines.

Construction of 138 kV Transmission Line

The construction of the 138 kV transmission line will connect to the project collector substation, continue south for approximately 5 miles, until terminating at the Rebuilt Boulevard Substation. As mentioned previously, there are two alignment options for the 138 kV transmission line; and different locations for transmission poles respectively. Under either scenario, a 24-foot wide temporary area of disturbance would be necessary for access to construct the transmission line. The anticipated temporary construction area that will be necessary to construct the transmission line poles would be a 50-foot by 150-foot rectangle around each pole location.

The permanent disturbance area for the 138 kV transmission line would result from the construction of the transmission line poles. Each transmission line pole would be direct buried, with a maximum pole

hole dimension of 8 feet wide by 25 feet deep. Pole holes would be excavated using a truck-mounted drill rig and poles would then be delivered on a flat-bed trailer and hoisted into place by a crane. The annular space between poles and holes would then be backfilled with soil or concrete. Any remaining excavated material would be placed around the holes or spread onto access roads and adjacent areas.

Road Construction

Roads will be located away from drainage bottoms and wetlands, if practicable. Roads will be designed to maintain current surface water runoff patterns, and to prevent erosion. Soil erosion will be controlled at culvert outlets with appropriate structures. Catch basins, roadway ditches, and culverts will be cleaned and maintained regularly. If road grade and/or runoff patterns indicate, added erosion control measures will be installed to minimize erosion.

For existing and proposed access roads located on land under the jurisdiction of the County of San Diego, road design, construction, and maintenance procedures will be developed in accordance with DPW Private Road Standards. Adjustments to the County private road standards may need to be considered, given the size of wind turbine components and cranes to be utilized, and the special conditions of the project.

Transportation routing will be conducted to minimize impacts to normal traffic flow during the transport of turbine components, main assembly cranes, and other large pieces of equipment (See Section 6.0 Construction Plans for more information related to traffic and ground transportation).

Construction Water Usage

Water will be required during the construction phase of the project for road construction, turbine foundations, and for dust suppression. Wind turbines between 1.5 MW and 3.0 MW in size were analyzed to project anticipated groundwater demand because Tule Wind LLC is still evaluating the optimum turbines to utilize for the Tule Wind Project. Regardless of the wind turbine size selected, however, the maximum project size will be 201 MW. If larger MW turbines are used, fewer turbines will be installed to build the 201 MW project. Accordingly, estimated water demand will change depending on the size of the wind turbine ultimately selected by Tule Wind LLC. The *Revised Groundwater Investigation Report* takes into account wind turbine size when analyzing both the estimated total water demand for the Tule Wind Project and the estimated peak water demand.

The anticipated water usage for construction (based on a five-day work week) for each project construction activity is described as follows:

1. Road Construction – Up to 120,000 gallons per day (gpd) will be required over a 72-day construction period, or approximately 8,640,000 gallons of water for road construction.

2. Turbine Foundation Concrete Mixing – Depending on the turbine, each foundation will require 7,500 to 15,000 gallons of water per foundation. Tule Wind LLC can construct two 1.5 MW foundations per day (approximately 7,500 gpd water demand per turbine, for a total of 15,000 gpd water demand), or two 3.0 MW foundations per day (approximately 15,000 gpd per turbine, for a total of 30,000 gpd water demand). Accordingly, water demand will be approximately 15,000 gpd to 30,000 gpd, depending on the turbine size selected.

   It is important to note, however, that if larger turbines are used (such as a 3.0 MW turbine), then fewer turbines will be built to create a 201 MW project. For purposes of estimating total water

demand for this construction activity, 15,000 gpd (based on two turbines per day and 128 turbines, which equals 64 days of turbine foundation concrete mixing), or approximately 960,000 gallons is estimated for turbine foundation concrete mixing. This total water demand would be slightly higher if 3.0 MW turbines were used because only 67 3.0 MW turbines would be built to achieve the 201 MW project (30,000 gpd, for 34 days of turbine foundation construction), or approximately 1,020,000 gallons.

3. Dust Suppression During Turbine Foundation Construction – Dust suppression during turbine foundation construction is estimated to require 100,000 gpd for approximately 64 days for 128 turbines, or approximately 6,400,000 gallons. If 3.0 MW turbines are constructed, however, dust suppression would occur for approximately 34 days (two turbines per day, 67 total turbines), which would reduce estimated total dust suppression demand during turbine foundation construction to 3,400,000 gallons, but would not reduce estimated peak water demand.
4. Dust Suppression During Turbine Erection – An estimated 58 days for turbine erection will be required. During this period of turbine erection, approximately 50,000 gpd will be required for dust control on project roads, or approximately 2,900,000 gallons.
5. Fire Protection (Four 10,000 gallon tanks) – 40,000 gallons total, which constitutes a one-time filling of all four (4) 10,000 gallon tanks provided to the San Diego Rural Fire Protection District.

Assuming full build out of the project (128 turbines), the peak water demand for the Tule Wind Project will be approximately 235,000 gallons per day when (1) Road Construction (approximately 120,000 gallons per day) overlaps with (2) Turbine Foundation Concrete Mixing (15,000 gallons per day) and (3) associated Dust Suppression (approximately 100,000 gallons per day), which equates to a rate of groundwater withdrawal of 117 gpm (see Table 6, below).

Assuming full build out of the project using 67 3.0 MW turbines, however (as also presented in Table 6, below), peak water demand for the Tule Wind Project will be approximately 250,000 gallons per day; and would equate to a rate of groundwater withdrawal of 124 gpm with continuous pumping, although the period of peak demand will be shorter because less turbines will be constructed.

Further refinement of proposed construction activities and estimated duration of construction indicates that it is likely that the maximum number of peak water demand days will be between 34 and 64 days (depending on the size of turbine selected), when it is possible (but not certain) that (1) Road Construction, (2) Turbine Foundation Concrete Mixing, and (3) associated Dust Suppression may occur on the same days. Tule Wind LLC has also confirmed that it is unlikely that peak water demand conditions would occur on consecutive days, and that it is much more likely that any periods of peak water demand would be separated by days with lower water demand rates. Accordingly, it is likely that periods of peak water demand may be buffered by water supplies stored onsite.

In sum, the peak water supply demand analysis presented herein, which evaluates the ability of the Tule Wind Project's groundwater supply sources to support 117 gpm to 124 gpm of continuous water withdrawal over a nine month period, goes well beyond the "worst case" scenario expected for the construction of the Tule Wind Project. This is so because peak water demand of 117 gpm to 124 gpm during construction of the Tule Wind Project will not likely exceed 34 to 64 total days (based on the number of days necessary to build the turbine foundations, depending on the turbine type selected), would not likely occur consecutively, and could be buffered with onsite water storage. It is also worth noting that total construction water demand will be approximately 58 acre-feet, unless larger turbines are selected, in which case total water demand could be lower. See Table 6 below.

Table 6
Estimated Total Construction Water Demand and Peak Construction Water Demand
For the Tule Wind Project Under Two Turbine Scenarios

128 Turbines [67 Turbines][1]	Daily rate (gpd)	Minute rate (gpm)[2]	Days	Gallons
1. Road Construction	120,000	59.5	72	8,640,000
2. Turbine Foundation Concrete Mixing	15,000 [30,000]	7.4 [14.9]	64 [34]	960,000 [1,020,000]
3. Dust Suppression During Foundation Construction	100,000	49.6 [same]	64 [34]	6,400,000 [3,400,000]
4. Dust Suppression During Turbine Erection	50,000	25	58	2,900,000
5. Fire Protection - 4 tanks			1	40,000
Estimated Peak Water Demand (Road Construction + Turbine Foundation Concrete Mixing + Dust Suppression During Foundation Construction)	**235,000 [250,000]**	**117 [124]**	**64 [34]**	
Estimated Total Construction Water Demand (Gallons)				**18,940,000 [16,000,000]**
Estimated Total Construction Water Demand (Acre-Feet)* * one acre-foot is 326,000 gallons				**58 [49]**

[1]The 201 MW project will include a maximum of 128 turbines. The DEIR/DEIS analyzes turbine sizes from 1.5 to 3.0 MW. If 3.0 MW turbines are selected, only 67 turbines would be installed (67 * 3.0 MW = 201 MW). Where use of 3.0 MW turbines would change peak or total water demand, those changes are reflected in brackets in Table 1.

[2]To calculate the gallons per minute demand for each project activity, pumping is calculated by assuming continuous pumping, seven days per week, twenty-four hours per day, to supply demand over a five day workweek. Accordingly, the gallons per minute demand rate is calculated with the following formula: ((gallons per day * 5 days) / 7 days) / (24 hours * 60 minutes). For example, to calculate gallons per minute demand for road construction, the calculation is: ((120,000 * 5) / 7)) / 1440 = 59.5 gpm.

Construction Water Availability

Because the project water demand exceeds 20,000 gallons per day, the project is considered a water intensive use and requires a cumulative or basin-wide groundwater investigation to assess the available groundwater resources for the proposed project, evaluate the sustainable production capacity of proposed project wells, and identify any potential impacts from the project groundwater pumping on other groundwater users within the project's watershed. In September 2010, Geo-Logic Associates conducted initial groundwater well testing and prepared a Groundwater Investigation Report (December 2010). In response to the County's comments on the Groundwater Investigation Report made during the public comment period for the DEIR/EIS, Geo-Logic provided a supplemental analysis and backup assumptions to adequately ensure sources of water are necessary to meet the demands of the project. The supplemental analysis and backup assumptions are included in the *Revised Groundwater Investigation Report* (October 2011). Subsequent to the DEIR/EIS comment period, Tule Wind LLC conducted further well testing in accordance with the well test plan approved by the County. The *Revised Groundwater Investigation Report* includes groundwater testing results and analysis provided in response to County comments made during the public comment period. The *Revised Groundwater Investigation Report* was prepared in accordance with the County Groundwater Ordinance and County Guidelines Report Format and Content Requirements. Two copies of the *Revised Groundwater Investigation Report* were provided to the County DPLU on September 13, 2011. Subsequent to the September 13, 2011 submittal of the *Revised*

Groundwater Investigation Report, additional comments were received from the County that required among other revisions, a more refined analysis on the aquifer conditions for Well #6-6a and #8. The *Revised Groundwater Investigation Report* (October 2011) is provided as Appendix I of this MUP submittal.

Concrete Quantities

Approximately 275 to 707 cubic yards of concrete (depending on the size of turbine used) will be incorporated into each turbine foundation pad. The concrete, aggregate, and sand could be sourced from local and permitted quarries. After the aggregate and sand is trucked to the batch plant, it would be placed into stockpiles. Cement, obtained from nearby vendors, could also be delivered by truck and stored in silos. Approximate quantities for raw materials needed for each turbine installed would include:[4]

- Sand – 350,000 to 700,000 pounds per turbine
- Aggregate –475,000 to 950,000 pounds per turbine
- Cement – 200,000 to 400,000 pounds per turbine

Construction in Sensitive Areas

Impacts to wetlands, drainages and sensitive areas will be avoided or minimized to the extent possible. In accordance with CEQA and NEPA, field surveys were performed in all areas where construction is proposed to occur. Sensitive locations, such as archaeological sites, fragile watersheds, areas with protected species, and locations known to have cultural resources were identified during the field surveys. These sensitive areas will be excluded from the construction work areas and/or mitigated as appropriate.

As mentioned previously, the construction workforce will be trained to identify and avoid any sensitive areas that have been excluded from the right-of-way. Special efforts will be made to flag sensitive areas, and to minimize the potential for accidental disturbance from construction equipment and crews. Where possible, the applicant has avoided the need to construct roads on slopes greater than 10 percent. Where access roads or collector systems are proposed to cross a riparian area, the applicant will employ the following strategies:

- Use existing crossings (if available);
- Use Best Management Practices (BMPs) to avoid and minimize soil erosion; and
- Revegetate temporarily disturbed riparian zones

The applicant will avoid, minimize, or mitigate negative impacts on vulnerable wildlife, while maintaining or enhancing habitat values for other species. All construction employees will be instructed to avoid harassment and disturbance of wildlife, especially during reproductive (e.g., courtship and nesting) seasons. Construction personnel will not be allowed to have pets on site during construction. Additionally, the construction workforce training will reinforce that no plants or wildlife should be collected from the project site.

6.0 Construction Plans

During construction, the applicant will develop strategies to promote worker and public safety, and to avoid or minimize environmental impacts to the maximum extent feasible, as described below.

[4] Assumes the use of a 1.5 MW turbine.

Construction Waste and Hazardous Materials

Construction wastes will consist primarily of concrete waste from turbine pad construction, wood waste from wood forms used for concrete pad construction, and scrap metal steel from turbine tower construction. Additional wastes could include erosion control materials, such as straw bales and silt fencing, and packaging materials for associated turbine parts and other electrical equipment. Construction wastewater will be generated from concrete trucks after concrete loads have been emptied. The contractor will be required to conduct appropriate washdown activities. Portable toilets will be provided for on-site sewage during construction, and they will be pumped and cleaned regularly. No other wastewater will be generated during construction.

The applicant will prepare a Spill Prevention, Control and Countermeasures Plan compliant with EPA standards that identifies where hazardous materials and wastes are stored on site, spill prevention measures to be implemented, training requirements, appropriate spill response actions for each material or waste, the locations of spill response kits on site, a procedure for ensuring that the spill response kits are adequately stocked at all times, and procedures for making timely notifications to authorities.

Traffic and Ground Transportation

Access along public roads will be required for the transport of turbine components, main assembly cranes, and other large pieces of equipment. The applicant will work with the County to determine adequate access roads are provided on site to ensure that no hazards will result from the increased truck traffic and that traffic flow will not be adversely impacted. The applicant and construction contractor will provide informational signs and flaggers when equipment may result in blocked throughways, and traffic cones to identify any necessary changes in temporary lane configurations. A Traffic Control Plan will be prepared and implemented for the proposed project in accordance with DPW requirements.

Soil Stabilization

The applicant will maintain sound water and soil conservation practices during construction and operation to protect topsoil and adjacent resources and to minimize soil erosion. Appropriate BMPs for erosion and sediment control will be implemented during and after construction activities. A Stormwater Pollution and Prevention Plan (SWPPP) will be prepared for the proposed project in accordance with the State Water Resources Control Board criteria. Additionally, a Stormwater Management Plan (SWMP) was prepared in accordance with County requirements that identify post construction BMPs to be implemented for county lands (see Appendix D of this MUP submittal).

Site Restoration

After construction is complete, the applicant will work to restore vegetation for all temporarily disturbed areas. Topsoil from excavations and construction activities will be segregated from sub-soil and reapplied to the surface of the ground during reclamation. In order to reestablish plant communities of most value to wildlife, the appropriate weed-free native grasses, forbs, and shrubs will be used. Reclamation activities will be undertaken as early as possible on disturbed areas. Additional reclamation measures will be developed to address site-specific conditions as necessary. The applicant will strive to minimize and mitigate negative impacts on vulnerable plants and wildlife. A Conceptual Mitigation Plan and Revegetation Plan were prepared for the Tule Wind Project (see Appendix J of this MUP submittal).

Noxious Weeds and Invasive Species Control

The applicant's plan for control of noxious weeds and invasive species will address monitoring and educating personnel on weed identification, and methods for avoiding and treating infestations. Use of certified weed-free mulching will be required. The applicant will work with the County to obtain seeding specifications compliant with County standards.

If trucks and construction equipment arrive from locations with known invasive vegetation problems, a controlled inspection and cleaning area will be established to visually inspect construction equipment arriving at the project area and to remove and collect seeds that may adhere to tires and other equipment surfaces.

If pesticides are used on site, to the applicant will ensure that applications are conducted within the framework of County DPLU policies and use only approved pesticides. Pesticide use will be limited to Environmental Protection Agency (EPA) approved non-persistent, immobile pesticides and such approved pesticides will be applied only in accordance with label and application permit directions and stipulations for terrestrial and aquatic applications.

7.0 Operations and Maintenance

Upon completion of construction, the project is expected to be supported by up to 12 permanent full-time employees on the O&M staff. Typically, staff would be present onsite during normal business hours.

Maintenance activities will be limited to areas accessible by the permanent access roads. Each turbine would be serviced approximately twice a year. Turbine servicing activities might include temporarily deploying a crane, removing the turbine rotor, replacing generators, bearings, and deploying personnel to climb the towers to service parts within the turbine.

Computer systems inside each turbine would perform self-diagnostic tests and allow a remote operator to set new operating parameters, perform system checks, and ensure turbines are operating at peak performance. Turbines would automatically shut down if sustained winds or gusts exceed predetermined set points established by the turbine manufacturer to prevent equipment failure.

Minimal waste will be generated at the project site during operation. Waste from the O&M building (e.g., paper, cans, and bottles) will be collected and recycled as appropriate. The only other source of waste will be incidental waste from repair or replacement of electrical or turbine equipment. No industrial wastewater will be generated during project operations.

O&M staff will maintain a positive external appearance of facilities. On-site equipment will include utility vehicles and other equipment that are necessary for operations. Operations personnel will be responsible for the waste management program, ensuring that solid waste is disposed in dumpsters, and that any hazardous wastes are properly disposed in accordance with the waste management plan and applicable rules.

8.0 Decommissioning

A Draft Decommissioning Plan was prepared for the proposed project, and is included as Appendix K. The decommissioning plan will be revised prior to ceasing of project operations. The final decommissioning plan will include a site reclamation plan and monitoring program. It is anticipated that requirements in effect at that time will require that all above-ground portions of the project, including

turbines and ancillary structures, be removed from the site. However, the final decommissioning plan will be developed in compliance with the standards and requirements for closing a site at the time decommissioning occurs.

When the facility is retired or decommissioned, the turbine towers will be removed from the site and the materials will be reused or sold for scrap. Decommissioning activities are anticipated to have similar types of construction-related activities; and therefore, all management plans, BMPs, and stipulations developed for the construction phase of the project will be applied to the decommissioning phase of the project.

After facilities have been removed and the site is returned to pre-construction and operation conditions, the applicant will implement a habitat restoration plan, similar to the plan utilized during construction. Topsoil from all decommissioning activities will be salvaged and reapplied during final reclamation. All areas of disturbed soil will be reclaimed using weed-free native shrubs, grasses, and forbs. The vegetation cover, composition, and diversity will be restored to values commensurate with the area's ecological setting.

APPENDIX C

Affected Properties

Tule Wind Project

Affected Properties

APN	OWNER NAME	OWNER ADDRESS	CITY	ZIP
5291100100	HARMONY GROVE PARTNERS L P	1000 PIONEER WAY	EL CAJON CA	92020
5291400100	HARMONY GROVE PARTNERS L P	1000 PIONEER WAY	EL CAJON CA	92020
5291500100	HARMONY GROVE PARTNERS L P	1000 PIONEER WAY	EL CAJON CA	92020
6110300100	HARMONY GROVE PARTNERS L P	1000 PIONEER WAY	EL CAJON CA	92020
6110600400	VISTA OAKS BUSINESS PARK L P	1000 PIONEER WAY	EL CAJON CA	92020
6110700100	HARMONY GROVE PARTNERS L P	1000 PIONEER WAY	EL CAJON CA	92020
6110900200	VISTA OAKS BUSINESS PARK L P	1000 PIONEER WAY	EL CAJON CA	92020
6110900400	VISTA OAKS BUSINESS PARK L P	1000 PIONEER WAY	EL CAJON CA	92020
6110901500	GARBER JEFFREY M&PEGGY A	541 ROBINSON RD	IMPERIAL CA	92251
6110910900	VISTA OAKS BUSINESS PARK L P	1000 PIONEER WAY	EL CAJON CA	92020
6111000100	HARMONY GROVE PARTNERS L P	1000 PIONEER WAY	EL CAJON CA	92020
6111000200	HARMONY GROVE PARTNERS L P	1000 PIONEER WAY	EL CAJON CA	92020
6111100100	WATERSTONE SUPPORT FOUNDATION	2925 PROFESSIONAL PL #200	COLORADO SPRINGS CO	80904
6120911200	HORNER STEPHEN&CATHERINE	P O BOX 360	POTRERO CA	91963
6120911300	LANSING INDUSTRIES INC	5415 OBERLIN DR	SAN DIEGO CA	92121
6120921300	SAN DIEGO GAS&ELECTRIC CO	CALIFORNIA STATE ASSESSED		00000
6130101400	WUEST ESTATE CO	3580 BAYSIDE WALK	SAN DIEGO CA	92109
6130101500	WUEST ESTATE CO	3580 BAYSIDE WALK	SAN DIEGO CA	92109
6130101600	WUEST ESTATE CO	3580 BAYSIDE WALK	SAN DIEGO CA	92109
6130302800	LANSING INDUSTRIES INC	5415 OBERLIN DR	SAN DIEGO CA	92121

APPENDIX D

Public Notice Package

COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND LAND USE: Zoning
SUPPLEMENTAL PUBLIC NOTICE CERTIFICATION
Board of Supervisor's Policy I-49
Distribution of Notification of Land Use Hearings

I hereby certify that I have been informed of the supplemental notice requirements pursuant to Board Policy I-49 and understand that if any of the information below is incorrect, the permit processing and/or the public hearing may be delayed.

I hereby certify that the following properties submitted with the Public Notice Package for Case Number PAA 3801-11-001 shall be posted with DPLU #319 within ten (10) days from the date processing fees are paid.

Assessor's Parcel Number(s)

529-110-01; 529-140-01; 529-150-01; 611-030-01; 611-060-04; 611-070-01; 611-090-02; 611-090-04; 611-090-15; 611-091-09; 611-100-01; 611-100-02; 611-110-01; 612-091-12; 612-091-13; 612-092-13; 613-010-14; 613-010-15; 613-010-16; 613-010-28

APPLICANT:
If posting cannot be accomplished the applicant shall notify the assigned project planner within ten (10) days of the date processing fees are paid.

Signature of Applicant

October 6, 2011
Date

DPLU-299 (12/09)

COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND LAND USE: Zoning
PUBLIC NOTICE CERTIFICATION

I hereby certify that the names and addresses submitted with the Public Notice package for PAA 3801-11-001 (*Case Number*) are those of the owners of record of the project site and of all properties within 300 feet (*Distance*) of the exterior boundaries of the property described in the application, and that the Assessor's Parcel Number and ownership information were obtained from the latest adopted San Diego County Tax Roll, and any update thereto, maintained in the office of the San Diego County Tax Assessor on September 1, 2011.

I understand that if it is found that any of this information is incorrect, the public hearing may be declared null and void by the decision making body or the courts and the application may have to be refilled and the fee paid again.

10/06/2011
Date

Owner or Agent

Stuart Webster, Wind Energy Permitting Director
Print or type name and title of signator

COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND LAND USE: Zoning
INSTRUCTIONS FOR VICINITY MAP AND PROJECT SUMMARY PREPARATION

State law and County code require that adjacent property owners be notified of certain types of Development projects submitted for approval to the Department of Planning and Land Use. It is the applicant's responsibility to prepare and submit a vicinity map and a completed project application. The information will be reviewed for accuracy by the DPLU Counter staff. Incorrect information or a non-standard format may result in the application being rejected. Listed below are instructions for properly completing these requirements.

1. The purpose of the vicinity map is to show the location of the project relative to adjacent property, streets, and highways. It will also be used to indicate the lot sizes and patterns of surrounding property. The scale should be such that the project site makes up only the center portion of the vicinity map, with approximately ¼ mile around the site shown.

2. Maps may be copies of a County Base Map, a Thomas Brothers Map, a Parcel Map or hand drawn.

3. Draw the project boundaries on the map in **black** ink and give the exterior dimensions. Tentative Map applications shall show the proposed street layouts and lot designs.

4. Include the scale of the map and North arrow.

5. Complete the top part of the notice except for case number and date.

6. Submit one copy of the vicinity map and the completed project summary with the project application. For further information, call (858) 565-5981.

County of San Diego, Department of Planning and Land Use

PROJECT SUMMARY

NOTICE TO PROPERTY OWNERS

An application for the following discretionary permits(s) for a property in your neighborhood has been filed with the Department of Planning and Land Use:

Case Number: _____ Date received: _____ Thomas Brothers: _____

Site Address: Multiple Properties in the McCain Valley (Boulevard area)

Proposed use: Civic Use Type - Major Impact Services and Utilities

Owner/Applicant: Tule Wind LLC Engineer: Mark Mullen

Community/Sub-Regional Plan Area: Mountain Empire/Boulevard Subregional Plan Area North Arrow

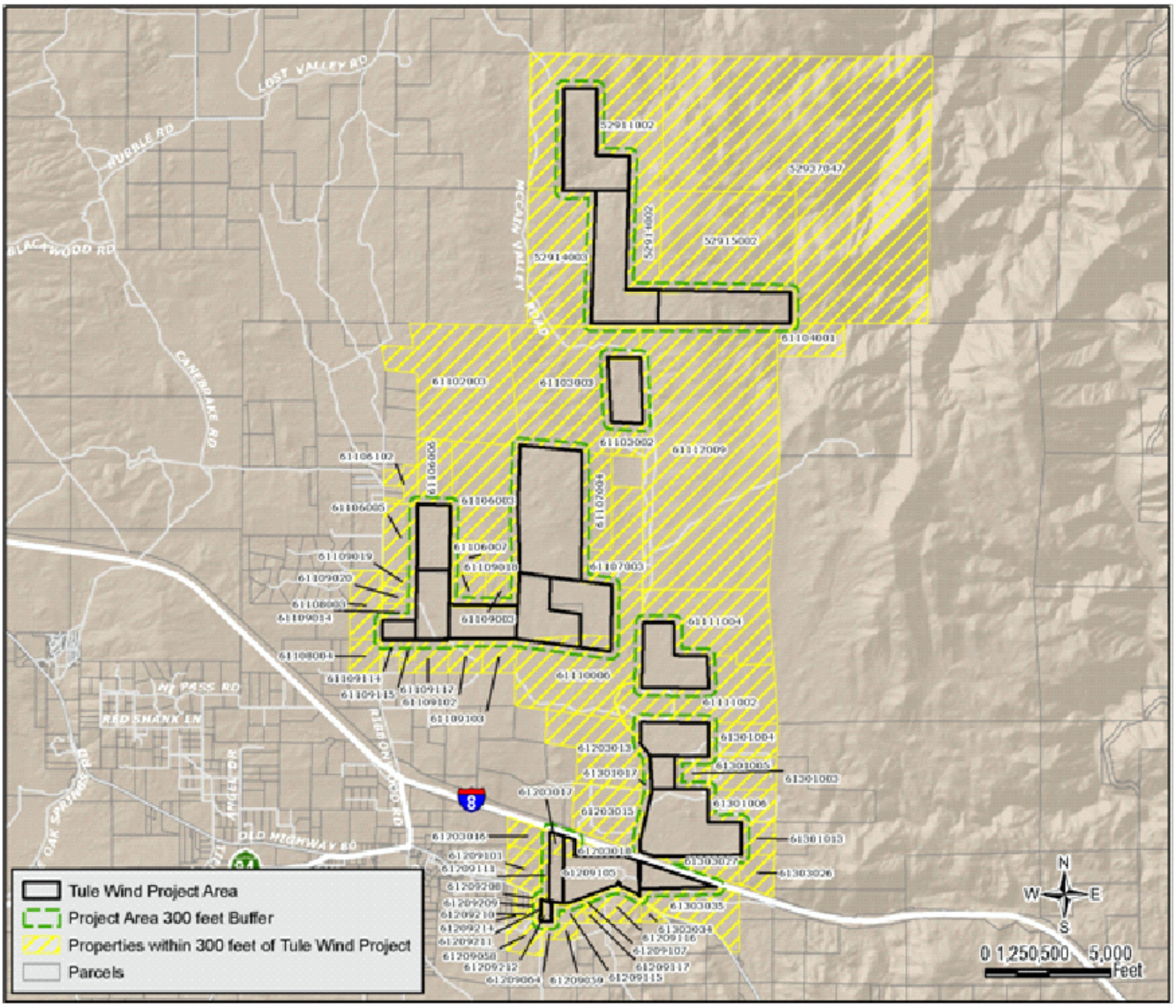
General Plan Designator: RL-80; RL-40; SR-10 Regional Category: Rural

Zoning Designation: Existing A-72; S-92 Proposed: no proposed amendment

Acres: 1,983 Number of lots: 20 Number of dwelling units: 0

Assessor Parcel Number (s): see APN list Scale: 1" =

For further information please contact the Planner: at (858)



DPLU-524 (05/10)

APN 61103002
MCCALLISTER ROBERT&KATHRYN FAMILY TRUST
P O BOX 1263
BOULEVARD CA 91905

APN 61106003
HARMONY GROVE PARTNERS L P
1000 PIONEER WAY
EL CAJON CA 92020

APN 61106005
MARTINO NICK
2742 RIBBONWOOD RD
BOULEVARD CA 91905

APN 61106102
MCMANUS KATHRYN A TR
710 MULBERRY LN
EL CENTRO CA 92243

APN 61107003
ROUGH ACRES FOUNDATION
2925 PROFESSIONAL PL #201
COLORADO SPGS CO 80904

APN 61108003
CONIHITCH MARY PATRIA LA CHAPPA(INDIAN LANDS)
PUBLIC AGENCY
00000

APN 61108004
SCHEIDEL CAROLYN E FAMILY TRUST 07-27-06
3025 CAMINO DE LAS PIEDRAS
EL CAJON CA 92019

APN 61109014
RUSSELL DANIEL W&LAURIE L
3522 UNION ST
SAN DIEGO CA 92103

APN 61109019
WALKER ROBERT A&VICTORIA J
P O BOX 1243
BOULEVARD CA 91905

APN 61109020
FELTEN RANDY P&LAURA M
2669 RIBBONWOOD RD
BOULEVARD CA 91905

APN 61109102
HEIMERDINGER YORK A&TINA M
P O BOX 555
PINE VALLEY CA 91962

APN 61109103
VISTA OAKS BUSINESS PARK L P
1000 PIONEER WAY
EL CAJON CA 92020

APN 61109114
SHANNON DAVID C&LINDA L
P O BOX 1527
BOULEVARD CA 91905

APN 61109115
WILSON DENNIS D&CELESTE J
11945 HANDRICH DR
SAN DIEGO CA 92131

APN 61109117
PITTA DAVID&RHONDA FAMILY TRUST 10-08-04
3113 DICKENS ST #C
SAN DIEGO CA 92106

APN 61111002
WUEST ESTATE CO
3580 BAYSIDE WALK
SAN DIEGO CA 92109

APN 61203015
PARRY DEBORAH J
18223 CAPSTAN GREENS RD
CORNELIUS NC 28031

APN 61203016
BURNI FAMILY TRUST
8110 AERO DR #2000
SAN DIEGO CA 92123

APN 61203017
HORNER JIMMY
P O BOX 360
POTRERO CA 91963

APN 61203018
LANSING INDUSTRIES INC
12770 HIGH BLUFF DR #160
SAN DIEGO CA 92130

APN 61209058
TROY MICHAEL P
P O BOX 1347
BOULEVARD CA 91905

APN 61209059
ELDER LISA A
771 JAMACHA RD #271
EL CAJON CA 92019

APN 61209064
SHOOP EDWARD
40751 OLD HIGHWAY 80
BOULEVARD CA 91905

APN 61209101
CALEXICO LODGE
P O BOX 202
IMPERIAL CA 92251

APN 61209105
MAYO ANTHONY W&TELECIA R
41148 OLD HIGHWAY 80
BOULEVARD CA 91905

APN 61209208
GALVIN PATRICK&HELEN
P O BOX 2797
RANCHO SANTA FE CA 92067

APN 61209209
MCGOVERN JOHN JR&MEMORY S
6811 ELMORE ST
SAN DIEGO CA 92111

APN 61209210
VILLARO JOHN JR&JOSEPHINE O
207 KILANI PL
WAHIAWA HI 96786

APN 61209211
NAVA CARLOS J&CLOTILDE TRS
404 E MCCABE RD
HEBER CA 92249

APN 61209214
SEMPSROTT DAVID LIVING TRUST 12-19-00
6607 BROADWAY
SAN DIEGO CA 92114

APN 61301017
COLLINS JIMMIE L
P O BOX 1561
BOULEVARD CA 91905

APN 61303027
WUEST ESTATE CO
3580 BAYSIDE WALK
SAN DIEGO CA 92109

APN 61303034
GADDIS JOHN M&JULIE L
429 MAIN ST
EL CENTRO CA 92243